



2025 Sustainability Report.



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Introduction



About This Report

A Message on Our Business

This report provides sustainability-related disclosures, including those mandated in Canada under Office of the Superintendent of Financial Institutions (OSFI)'s Guideline B-15: Climate Risk Management.

TD serves clients across numerous industries and geographies and provides access to financial services to all clients without discrimination, and without regard to political or religious views. TD's sustainability program and activities comply with the legal and regulatory requirements in all of the jurisdictions in which it operates. TD takes seriously its obligation to manage climate-related risks and opportunities. Doing so allows us to understand and conduct business with our clients in a risk-based, individualized manner.

Reporting Scope

This report provides information on TD for the fiscal year ended October 31, 2025. Please email tdreadycommitment@td.com for access to archived reports.

Additional information regarding the activities and operations of TD and its wholly owned subsidiaries is included in the Bank's [2025 Annual Report](#).

Throughout the report, "TD", "the Bank", "we", "us", or "our" refers to TD Bank Group.

The data supporting the report may be found in our [2025 Sustainability Performance Data Pack & Indices](#) ("Data Pack"), which includes footnotes and commentary regarding restatements and data changes, where applicable. This Sustainability Report includes an appendix containing our OSFI

B-15 Climate Risk Management Guideline Index, and the Data Pack includes our voluntary reporting indices.

Currency

All currency is in Canadian dollars unless otherwise noted.

Reporting Frameworks

This report is informed by the following reporting frameworks and standards:

- The reporting requirements of Canada's OSFI Guideline B-15: Climate Risk Management. For more information, refer to the [OSFI B-15 Index](#).
- The voluntary Sustainability Accounting Standards Board (SASB).
- The recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).
- Additional frameworks, such as the TCFD's Guidance on Metrics, Targets and Transition Plans and the International Financial Reporting Standards (IFRS) Foundation.

[+ 2025 Sustainability Performance Data Pack & Indices](#)

We actively monitor evolving regulations related to sustainability disclosure to ensure we comply with regulatory and legal requirements in every jurisdiction in which we operate.

External Assurance and Other Reviews

Ernst & Young LLP (EY) performed a limited assurance engagement over a selection of TD's social and environmental performance indicators and a reasonable assurance engagement with respect to TD's use of the net proceeds from its 2023 Green Bond issuance.

For further information, please see:

[+ 2025 Assurance Report for Sustainability Metrics](#)

[+ 2025 Assurance Report as Referenced in TD Sustainable Financing Report](#)

In addition to TD's own calculations, we ask LBG Canada to verify our corporate giving and assess our data based on its methodology, which helps account for the broader impacts of our financial contributions to communities.

[+ LBG Verification Statement](#)

Ways to Reach Us

If you would like to contact TD with feedback, here are a few ways to reach us:

Clients: customer.service@td.com

Shareholders: tdshinfo@td.com

Institutional investors: tdir@td.com

Suppliers: tdsource@td.com

Non-profits and community-based groups: tdreadycommitment@td.com

By text: TDHELP (834357)

Symbol Key

- Supporting content/links
- Performance indicators for which EY provided a limited level of assurance¹
- Facts and figures for which LBG assessed our data and calculated our corporate giving based on its methodology
- Resource Corner: Links to additional policies and references



A Message from Our Leadership



I am pleased to present TD's 2025 Sustainability Report.

Throughout the past year, amid geopolitical, economic, and technological change, TD further strengthened our Bank, supported our clients, and invested in the resilience and long-term potential of the communities and economies we serve.

Guided by our new purpose, **to reimagine what banking can be**, we are driving enduring outcomes that deliver value to all our stakeholders.

In 2025, we reimagined our Sustainability Strategy to align more closely with our purpose, focusing on three clear priorities: **Protect, Adapt, and Grow**. As you will see in this Report, we are *protecting* our business, clients, and communities from emerging risks and disruption; *adapting* our Bank through targeted investments in infrastructure, innovation, and capabilities; and positioning TD to capture new *growth* opportunities, as economies build energy security and climate resilience.

TD is proud to serve more than 28 million clients across Canada, the United States, and financial centres around the globe. This reach provides us with a unique perspective on the accelerating pace of change, including the rapid adoption of AI, and the impact on the clients, communities, and economies that rely on us for their financial success.

At a time when many are navigating uncertainty, rising costs, and financial pressure, our new brand positioning, **More Human**, reinforces our commitment to personal and meaningful connections.

We demonstrated this commitment throughout 2025 contributing \$178 million to more than 3,400 community organizations, to expand access to financial, housing, and employment opportunities across Canada and the United States, as part of our broader social impact approach.

In Canada, our financial access efforts as of the last year included \$5.7 billion through loans and other credit facilities for small and medium-sized businesses, and a range of housing access solutions to support over 2,500 households. In the U.S., our Community Impact Plan remains a cornerstone of our engagement, with \$8.1 billion USD in affordable housing financing, \$1.8 billion USD in small business lending, and \$6.7 billion USD in community development lending delivered since 2024.

The strong outcomes and stories of positive impact found throughout this Report reflect the dedication of our colleagues. As they contribute to our success and invest their time and energy in our communities, we support them with training, new tools, and AI-enabled applications to enhance performance, simplify work, and accelerate

execution across the Bank. We believe a high performing, inclusive workplace that removes barriers and empowers great talent is essential to our continued success.

I invite you to read our Report to learn more about our progress and ongoing efforts to leverage our scale, expertise, and purpose to drive positive outcomes across the Bank, for our clients, and in our communities.

Raymond Chun
Group President and Chief Executive Officer



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Sustainability at TD



TD Sustainability Strategy

TD's performance and resilience are tied to the success of our clients, colleagues and communities. Our Sustainability Strategy enables TD to identify and address shifts in the operating environment, and is supported by periodic third-party materiality assessments, which identify the sustainability topics that present the most relevant risks, opportunities and impacts to our businesses and our stakeholders.

Supported by a strong track record of progress, we are deploying the Bank's resources and capabilities to Protect our Bank and our stakeholders, Adapt to a changing landscape and seize new opportunities to Grow.

Sustainability's Role in TD's Enterprise Strategy

In September 2025, TD launched its new strategy centred on three pillars that enhance client experience, accelerate growth and drive long-term shareholder value. Our Sustainability Strategy reinforces the Bank's enterprise strategy:

Deeper Relationships

Through deeper relationships, we extend our ability to serve, support and guide our clients, strengthening their financial resilience and creating new opportunities for them to grow.

+ [Sustainable Finance](#)

Simpler and Faster

Investing in data, technology and analytics helps to reduce complexity in sustainability management at the Bank.

+ [Data, Technology and Analytics](#)

+ [Responsible Artificial Intelligence and the TD Sustainability Strategy](#)

Disciplined Execution

Strong governance and risk management practices ensure appropriate progress, reporting and alignment with regulatory and legal requirements in the jurisdictions in which we operate.

+ [Sustainability Governance](#), including + [Enterprise Sustainability Transition Program](#)

+ [Risk Management](#), including + [Climate Risk Management](#)

TD's Sustainability Strategy

Objective: Position TD to thrive and create shareholder value by building sustainability-related resilience and capabilities, and pursuing new opportunities for growth.

Protect

Protect our businesses from sustainability-related economic and industry changes

Adapt

Shape TD's internal infrastructure, capabilities and processes to manage sustainability challenges

Grow

Promote growth by deepening relationships, pursuing new opportunities and exceeding our clients' changing expectations

Sustainability Focus Areas

Economic Inclusion

Human Rights

Climate



Performance Highlights

	Supported by	Description	2025	2024
Climate	TD Climate Action Plan	Reduction in TD's internal operations, location-based Scope 1 and 2 GHG emissions by 25% by 2025, relative to a 2019 baseline of 162,849 tCO ₂ e ¹	-29%	-29%
Economic Inclusion	TD Social Approach ²	Overall employee engagement ³ (85% for 2025) ⁴	84%	84%
		For Canada only: Women in roles titled Vice President and above ^{5,6}	42.7%	42.7%
		Reach 500,000 participants through TD-led and supported financial education initiatives in Canada and the U.S. in 2025 ⁸	869,351	502,389
Corporate Governance	Governance processes	\$12 billion in affordable housing financing in Canada and the U.S. from 2023 to 2030 (cumulative from 2023) ⁹	\$8.5 billion	\$5.9 billion
		That women and men each comprise at least 30%–40% of the Board's directors of TD Bank Group (a global bank, incorporated under the laws of Canada) ^{5,6,7}	43% women 57% men	47% women 53% men
		Independent Directors are a substantial majority of the Board of Directors of TD Bank Group (a global bank, incorporated under the laws of Canada) ¹⁰	93%	93%
Client Experience and Protection	Legendary Experience Index (LEI)	LEI – TD Composite Score ¹¹ (75.15 for 2025)	76.59	75.63
Sustainable Finance	TD Sustainable Finance Strategy	\$500 billion supporting eligible environmental, decarbonization and social activities through lending, financing, underwriting, advisory services, insurance and the Bank's own investments (cumulative from 2023) ¹²	\$225.3 billion	\$145.9 billion
Community Well-being	TD Ready Commitment	\$1 billion toward community giving by 2030 (cumulative from 2019) ¹³	\$1,032 million	\$854 million

1 For additional information about our internal-focused Scope 1 and 2 target, see the [TD Environmental Approach](#) section.

2 More details on social performance can be found in the [TD Social Approach](#) section.

3 This represents overall employee engagement as measured using the TD Pulse Survey, which asks full-time and part-time employees (excluding contractors and individuals on short-term or long-term leave) to rate their level of commitment and connection to TD and their role along three dimensions (intention to stay, pride in working at TD and job satisfaction) on a scale of one to five: Strongly Disagree (1), Disagree (2), Neither Agree Nor Disagree (3), Agree (4) and Strongly Agree (5). The percentages under "Overall Experience" represent the average proportion of respondents in each group who either agreed (4) or strongly agreed (5) with the first three statements shown in the "Pulse Survey Results" table in the [2025 Sustainability Performance Data Pack & Indices](#).

4 Target is based on achieving results that are within the 75th percentile of a global benchmark (a three-year rolling benchmark), which is updated annually and consists of over 900 companies and 27 million responses, spanning geographies and industries.

5 TD is required to provide Board and executive officer gender diversity information in our Management Proxy Circular pursuant to requirements under applicable Canadian securities laws. See the [2026 Management Proxy Circular](#) for additional information.

6 TD seeks to hire, retain and develop the best talent. All nomination, hiring and other employment decisions are made on merit, in a non-discriminatory basis, consistent with applicable laws. All talent decisions are part of the Bank's talent management standards and policies, requiring decisions on talent development, promotions and employment decisions to be based on merit, capability and hiring the most qualified talent into every role. When making senior management appointments, the Bank considers all characteristics, skills and experiences that contribute to the candidate's capabilities.

7 In 2025, the TDBG Board established an aspirational goal that women and men each comprise at least 35% of the Board's directors.

8 Participants include clients and community members who take part in or receive information through sessions or programs in Canada and/or the U.S. that aim to improve their financial knowledge. "TD-led" initiatives include activities facilitated or delivered directly by TD. "TD-supported" initiatives include programs facilitated by or with charitable organizations that are both partially and fully funded by TD. In addition, the number of participants reported may not reflect unique participants, as participants might engage with multiple programs.

9 Includes the activities outlined in the "Affordable and Community Housing" category of the Sustainable & Decarbonization Finance Target, with the exception of residential real estate purchases. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for details. This \$12 billion affordable housing financing target covers key business activities of the Bank, including lending, financing, underwriting and advisory services. The target represents the cumulative amount of new financing and refinancing activities over eight years, from November 1, 2022 to October 31, 2030. Progress toward this target is also counted toward the Sustainable & Decarbonization Finance Target and is reported for activities in both Canada and the U.S.

10 In 2025, TD's Board of Directors had 14 members in total. Raymond Chun is not independent because of his role as Group President and Chief Executive Officer of the Bank. In 2024, TD's Board of Directors had 15 members in total and in 2023, the Board had 14 members in total.

11 Refer to [Client Experience and Protection](#) for information on TD's performance compared to its LEI target.

12 TD's Sustainable & Decarbonization Finance Target reflects our ambition to help grow the Bank, and is in addition to a range of financing for other clients and activities across sectors and in no way restricts or limits TD's activities. For more information, see the [TD Sustainable & Decarbonization Finance Target Methodology](#).

13 Figures are disclosed in CAD equivalent and include any donation commitments recognized as a legal obligation or a constructive obligation and expensed in the fiscal year before they were paid out. Figures do not include donations made through TD Friends of the Environment Foundation.



Protect

Corporate Governance and Integrity

Our Approach

The Bank's Board and management are committed to sound corporate governance practices, which contribute to the effective management of the Bank and to achieving the Bank's strategic and operational plans, goals and objectives. The Bank is committed to open and responsive communications with shareholders, stakeholders and the public. The Bank recognizes the importance of the engagement of its Board of Directors ("the Board") with shareholders in areas that are core to the Board's mandate. We have an independent Chair with a clear corporate governance leadership mandate and a Board that is responsible for fulfilling a number of duties.

These include:

- Approving the strategy and business objectives of the Bank and overseeing their execution.
- Overseeing the identification and monitoring of the top and emerging risks affecting the Bank's businesses.
- Holding the CEO and senior management accountable for setting the tone at the top for an integrity and compliance culture throughout the Bank.

Our Commitment to Human Rights

We are committed to supporting and respecting the protection of human rights in all of our operations across all of our businesses. This commitment is guided by the values reflected in the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the International Labour Organization's core conventions.

Human rights is a focus area in TD's Enterprise Sustainability Strategy, and various functions across the enterprise support in upholding TD's commitment to respecting human rights.

Our Approach in Action

[TD's Statement on Human Rights](#) details how TD supports and respects the protection of human rights by applying a risk-based approach in the ordinary course of making business decisions. Risk identification and assessment processes are core parts of how the Bank manages risk, and are embedded throughout the organization in governance processes, risk programs and practices. This includes conducting risk-based analysis for all significant financial and non-financial risks that the Bank faces, including environmental and social (E&S) risks. For information on how the Bank manages E&S risks, including human rights risks, refer to the [Risk Management](#) section of this report.

In compliance with and in consideration of the UK Modern Slavery Act (2015) and the Australian Modern Slavery Act (2018), TD annually publishes the approaches and measures it has taken during the previous fiscal year to assess and address modern slavery and human trafficking risks in its businesses and supply chains. We continue to enhance our tools to identify and assess E&S risks, including modern slavery risks from our suppliers. In 2025, we launched a new E&S risk assessment in our third-party risk management program to further support our ability to identify, assess and monitor these risks on an ongoing basis. For more information, see our [2025 Modern Slavery and Human Trafficking Report](#), which is reviewed and approved annually by the Board.

As a member of BSR's Human Rights Working Group, we work with international, multi-industry businesses in support of implementing the UNGPs, while supporting human rights through our business practices and philanthropy:

- [Supporting Victims of Human Trafficking](#): Through the TD Ready Commitment, TD donated \$360,000 over three years to Victim Services Toronto (VST), an organization that assists survivors of human trafficking across Canada, to support its Reclaim project. Through this project, VST works with banks (e.g., TD Helps – a division of the Bank that assists customers through financial hardships), telecommunication companies, property managers, and car rental companies across Canada to remove fraudulent activity and coercive debt from a victim's name and record.

- [Supporting Indigenous Communities](#): TD has a long-standing commitment to supporting the rights of Indigenous Peoples and remains committed to the Truth and Reconciliation Commission's Calls to Action, focused on creating opportunities and services that support Indigenous Peoples. Through collaboration, capacity building, and inclusive economic participation, we aim to create shared prosperity and contribute to a more equitable future for Indigenous Peoples and communities. See our [TD and Indigenous Communities in Canada – 2025 Update](#) for more information on our work to help advance the social and economic inclusion of Indigenous Peoples in Canada.
- [Human Rights Education](#): TD continues to support the International Centre for Human Rights Education, Equitas, and has provided more than \$1.6 million in funding over the past 10 years to advance community outreach events focused on human rights, including education initiatives for children and students, and disaster relief in crisis zones around the world.



Protect

Corporate Governance and Integrity continued

Our Approach in Action

Corporate Governance Policies, Principles and Practices

The Board's corporate governance policies, principles and practices, which are reviewed regularly by the Corporate Governance Committee of the Board of Directors and outlined in our [2026 Management Proxy Circular](#), focus on the Board's responsibilities to the Bank's shareholders and other relevant stakeholders and on creating long-term shareholder value. The Proxy Circular provides additional detail on the principles that guide TD's approach to governance. As noted in this circular, women comprise 43% (6 of 14) of all director nominees and women currently chair three of the Bank's five board committees.

Board Capabilities

The Board is composed of members with a broad spectrum of capabilities (e.g., skills, age, education, experience and expertise from a range of industry sectors, geographies and perspectives) that reflect the nature and scope of the Bank's business. All of the directors have significant expertise in executive leadership and corporate governance. For details about the Board Diversity Policy, see TD's [2026 Management Proxy Circular](#).

For examples of how the TD Board of Directors is engaged on sustainability topics, see the [2026 Management Proxy Circular](#).

Promoting Responsible Practices and Adherence to Our Code of Conduct and Ethics

We maintain checks and balances that are designed to help foster responsible conduct across our businesses. These checks and balances include governance structures, oversight committees, monitoring programs, complaint escalation protocols, and training programs for colleagues that support adherence to our corporate values and selling practices. Through processes such as conduct risk reporting, complaint handling and Human Resources investigations, issues are identified and addressed in a consistent manner. Colleagues who fail to comply with TD's Code of Conduct and Ethics may be subject to disciplinary action, up to and including termination. Some of these checks and balances are outlined below.

Management of Conduct Risk: Conduct risk is an overarching risk category that correlates with various enterprise risks, including but not limited to consumer protection, market integrity, financial crimes, and operational risks. Conduct risk encompasses the potential for actions or behaviours by an organization or its colleagues that may lead to legal or financial impact that can adversely affect clients, the market, colleagues, and the organization. TD has prioritized conduct risk management and has policies in place to protect, to maintain trust, and to foster a culture of integrity and accountability with our clients and colleagues, the market and the organization. This involves fostering a culture of ethical behaviour, implementing robust governance frameworks, and ensuring colleagues understand and adhere to the organization's Code of Conduct and Ethics.

Between Us, Employee Ombudsman Office: This office provides confidential, impartial and informal guidance on work-related concerns to all colleagues, and reviews options for resolution. In 2025, this program, which is separate from the Conduct and Ethics Reporting, was accessed 1,446 times by colleagues (in 2024, 1,242 times).

Mandatory Training and Clear Communication: All employees, including members of the Board, must attest to our Code of Conduct and Ethics annually, as a requirement of their ongoing employment at TD. Employees who interact with clients receive mandatory training annually on understanding and assessing client needs, and regulatory compliance obligations including those related to anti-money laundering policies, anti-bribery and anti-corruption and privacy requirements. When relevant to their roles, colleagues are trained on and required to use tools in their conversations with clients, including offering a product assessment to help identify which product is appropriate based on the client's circumstances, including their financial needs. We also strive to use plain language when communicating with clients to make our documentation easier to read, understand and use.

Performance Management: TD reinforces reward and recognition for colleagues who demonstrate TD's values and deliver on the needs of clients. Our colleague incentive and reward programs reinforce TD's values and incorporate features aligned with desired behavioural outcomes. This includes a variety of factors, such as client experience and team and individual performance, with an ability to adjust compensation pools and individual decisions based on colleague conduct.



Protect

Corporate Governance and Integrity continued

Supplier Code of Conduct: TD strives for a responsible supplier network and seeks to build a large network of suppliers and demonstrate responsible practices while delivering high-quality goods and services. New or prospective supplier companies that provide goods and services through the Bank’s centralized Procurement Group must register through our enterprise procurement system, which requires these new or prospective suppliers to represent to TD that they operate in accordance with the expectations described in our [Supplier Code of Conduct](#).

As part of our approach to adapting our business and managing risk, TD aims to promote economic inclusion across our supply chains. TD works to onboard qualified suppliers from our communities to meet TD’s various needs. While TD’s supplier list primarily includes large corporations, the Bank’s Responsible Sourcing Program has helped us attract a broader list of suppliers in 2025. We continued to support awareness of the Refugee Entrepreneur Supplier Diversity Certification Program, which was introduced in 2022 by the Canadian Aboriginal and Minority Supplier Council and the Tent Partnership for Refugees. TD paid the certification fees for refugee-owned businesses for the first three years of the program, which ended on October 31, 2025.

Visit the following links for information about other policies and programs related to responsible conduct.

- [+ Code of Conduct and Ethics](#)
- [+ Summary of Respectful Workplace Policy](#)
- [+ Conduct and Ethics Reporting](#)
- [+ TD Bank Group Statement on Anti-Money Laundering/Anti-Terrorist Financing and Sanctions](#)
- [+ TD Bank Group Statement on Anti-Corruption](#)

TD’s Investment in Total Rewards

TD provides colleagues with a comprehensive total rewards package that includes a combination of base salary, variable compensation, benefits and wellness programs, and retirement and savings programs. The Bank’s philosophy about compensation is to provide a competitive package that is tailored, as appropriate, to the different practices of the locations in which the Bank operates. In 2025, we spent \$18.2 billion globally on salaries, incentive compensation and benefits.

For information about fair pay, see [TD’s Approach to Fair Pay](#). For information about executive compensation, including CEO pay ratio, see the [2026 Management Proxy Circular](#).

Progress on TD’s Anti-Money Laundering Program

Anti-money laundering (AML) programs are key for risk management, legal compliance and integrity for banks. In 2025, TD stayed focused on delivering against its top priority, advancing remediation efforts and strengthening its AML program. Examples of progress on our U.S. AML program include enhancing client onboarding procedures, deploying a new transaction monitoring platform, implementing targeted and Bank-wide training to reinforce understanding and accountability and strengthening leadership and talent.

While the Bank has made progress, significant work and important milestones remain in this multi-year endeavour to implement a strong and sustainable AML program. TD remains steadfast in its commitment to this critical work.

- [+](#) For further information on the remediation progress of TD’s U.S. and Enterprise AML programs, see the [2025 Annual Report](#).
- [+](#) For information on our corporate governance developments, including activities carried out by our Board as it relates to oversight of our AML remediation work, see the [2026 Management Proxy Circular](#).

Resource Corner

- [Corporate Governance and Integrity Data](#)
- [2026 Management Proxy Circular](#)
- [Corporate Governance at TD Bank Group \(including Proxy Access Policy\)](#)
- [Public Policy and Political Contributions](#)
- [TD Bank Group: Statement on Human Rights](#)
- [TD Modern Slavery and Human Trafficking Report](#)
- [TD’s Approach to Fair Pay](#)
- [TD Public Accountability Statement](#)



Protect

Risk Management

Our Approach

Operating a complex financial institution in multiple jurisdictions exposes the Bank’s businesses and operations to a broad range of financial and non-financial risks. TD has a responsibility to its stakeholders, including its investors, clients, colleagues and regulators, to maintain its strategic, financial and operational resilience through sound risk management practices. The Bank’s decisions are based on its risk appetite, as determined by its senior management and Board of Directors. TD’s Enterprise Risk Framework outlines how the Bank governs and manages risk, including environmental and social (E&S) risk, and is supported by frameworks, policies, procedures and practices to identify, assess, measure, control, monitor and report on risks. We evaluate customers in accordance with consistent risk management guidelines, policies, standards and procedures, and consider risk factors unique to customers and transactions.

Enterprise Risk Framework

The Bank’s Enterprise Risk Framework (ERF) reinforces the Bank’s risk culture, which emphasizes transparency and accountability, and supports a common understanding among stakeholders of how the Bank manages risk. The ERF addresses: (1) how the Bank defines the types of risk it is exposed to; (2) how the Bank determines the risks arising from the Bank’s strategy and operations; (3) risk management governance and organization; and (4) how the Bank manages risk through processes that identify and assess, measure, control, monitor and report risk. The

Bank’s risk management resources and processes are designed to both challenge and enable all of its businesses to understand the risks they face and to manage them within the Bank’s risk appetite.

Identifying Risk and Risk Appetite

Growing profitability involves selectively taking and managing risks within the Bank’s risk appetite. The Bank’s goal is to earn a return above its cost of capital for every dollar of risk it takes, while investing in its businesses to meet its strategic objectives. The Bank’s Risk Inventory sets out the Bank’s major risk categories and related sub-categories to which the Bank’s businesses and operations could be exposed. The Risk Inventory facilitates consistent risk identification, assessment, control, measurement, monitoring, reporting and disclosure of TD’s risks. The Risk Inventory is the starting point in developing risk management strategies and processes.

TD’s Risk Appetite Statement

The Bank’s Risk Appetite Statement (RAS) is the primary means used to communicate how the Bank views risk and determines the type and amount of risk it is willing to take to deliver on its strategy and to enhance shareholder value. In setting the risk appetite, the Bank takes into account its vision, purpose, strategy, shared commitments, and capacity to bear risk under both normal and recessionary/stress conditions. The core risk principles for the Bank’s RAS are as follows:

The Bank takes risks required to build its business, but only if those risks:

1. Fit the business strategy, and can be understood and managed.
2. Do not expose the enterprise to any significant single loss event; TD does not ‘bet the Bank’ on any single acquisition, business, product or decision.
3. Do not risk harming the TD brand.

Approach to Risk Management Processes

- **Risk Identification and Assessment** is focused on recognizing and understanding existing risks, risks that may arise from new or evolving business initiatives, aggregate risks, tail risks and emerging risks from the changing environment.
- **Measurement** processes align with regulatory requirements such as capital adequacy, leverage ratios, liquidity measures, stress testing, and maximum credit exposure guidelines established by regulators. In addition, the Bank has processes in place to quantify risks to provide accurate and timely measurements of the risks it assumes.
- **Control** processes are established and communicated through the Risk Committee of the Board and other Board oversight Committees, management-approved policies, associated management-approved procedures, control limits and delegated authorities that reflect TD’s risk appetite and risk tolerances.

- **Monitoring and Reporting** on risk levels is conducted on a regular basis against TD’s Risk Appetite Statement, and Risk Management reports on its risk monitoring activities to senior management, the Board and its Committees, and appropriate executive and management committees. Complementing regular risk monitoring and reporting, ad hoc risk reporting is provided to senior management, the Risk Committee and the Board, as appropriate, for new and emerging risks or any significant changes to the Bank’s risk profile.

Resource Corner

[Risk Management Data](#)

[2025 Annual Report: Managing Risk](#)
(p. 92-127)

[2026 Management Proxy Circular: Report of the Risk Committee](#) (p.76-78)



Protect

Risk Management continued

Environmental and Social Risk Management

Defining Environmental and Social Risk

E&S risk, including climate risk, is the risk of financial loss or other harm resulting from the Bank's inability to manage and respond to changing environmental or social factors that impact or are associated with the Bank's operations, business activities, products, clients, or the communities in which the Bank operates.

- Environmental risk is the risk of financial loss or other harm resulting from environmental factors, including but not limited to climate change, nature degradation, and biodiversity loss.
- Social risk is the risk of financial loss or other harm resulting from social factors, including but not limited to adverse human rights, social impacts of climate change, and health and well-being of employees.

The Enterprise E&S Risk Framework outlines how the Bank manages E&S risk, and this is reinforced by the Enterprise E&S Risk Policy and other risk-specific policies. Refer to the [TD Environmental Approach](#) section for more information on the E&S Risk Framework and climate-related risk.

Environmental and Social Due Diligence

TD applies a risk-based approach in the ordinary course of making business decisions; risk identification and assessment processes are a core part of how the Bank manages risk, and these processes are embedded throughout the organization in governance processes, risk programs and practices. This includes conducting risk-based analysis for all material financial and non-financial risks that the Bank faces, including E&S risk. As with any other financial or non-financial risk, the Bank has developed tools to identify, assess, monitor, mitigate and report E&S risks, including climate-related risks.

When a risk assessment indicates a heightened level of risk, the Bank conducts enhanced due diligence that could include the use of tools such as physical risk identification, heatmaps, client engagement and questionnaires, financed emissions estimation and analytics systems, environmental site assessments, site visits, industry research, and media scans, as applicable.

Control processes are established and communicated through policies, procedures, control limits, and delegated authorities that reflect TD's risk appetite and risk tolerances. TD makes decisions to conduct transactions based on the risks presented and the Bank's ability to manage those risks. ESG Risk Management reviews the risk assessments and if applicable will make escalation recommendations. The respective line of business follows business-as-usual processes to escalate the transactions for further review by the applicable risk committee, as required.

Enhancing E&S Risk Management

We continue to review and, where appropriate, enhance our processes and tools to identify, assess and manage E&S risks. With respect to our third-party risk management processes, in 2025, we implemented enhancements to more fully integrate E&S risk considerations, including modern slavery risks, from our third-party suppliers. With respect to our non-retail credit lending processes, we also continued to invest in technology solutions to provide our frontline colleagues with effective and efficient risk assessment tools. In 2025, ESG Risk Management made enhancements to its E&S risk assessment process for non-retail credit lending (including assessments of human rights and modern slavery risks) through the launch of a cloud-based platform, the Environmental and Social Risk Hub, where E&S risks from our non-retail credit clients can be assessed, escalated and monitored.





Protect

Data Security and Privacy

Our Approach

Maintaining our clients' trust and safeguarding their privacy, protecting the Bank and its systems and keeping information secure, are fundamental priorities for TD and help us to be disciplined in our execution. Through appropriate oversight and governance, mandatory colleague training, continuous threat monitoring, tracking developments in industry frameworks and adhering to applicable requirements (where applicable for TD), the Bank has developed an approach to managing risks related to data security and privacy. We monitor and manage the security and privacy risks relevant to the Bank and enhance our ability to mitigate these risks through enterprise-wide programs, industry-accepted practices, and threat and vulnerability assessments and responses.

Enhancing Cybersecurity

Governance and Policy

- Cybersecurity is a component of TD's overall risk management framework. Our Chief Information Security Officer oversees our cybersecurity program and provides updates to the Board of Directors ("the Board").

- TD's Technology Risk Management and Cybersecurity Policy, related framework and standards protect information and manage technology risks. Security measures include firewalls, data protection, behavioural analytics, strong authentication, and around-the-clock monitoring through our 24/7 Fusion Centres to help maintain the quality of TD's technology systems and identify unusual account activity.
- TD's cybersecurity strategies are regularly reviewed, calibrated to business requirements, and updated as necessary. The Board has Directors with experience in technology management and information security.
- See [TD's Annual Report](#) for more information about technology and cybersecurity risk.

Training and Culture

- We recognize the critical role that everyone plays in safeguarding data privacy and protecting the Bank from cyber threats. All colleagues are required to complete mandatory cyber, privacy and information security training that is refreshed and assigned annually. This training program provides colleagues with knowledge about the types of cyber threats impacting the Bank. Additionally, executives and the Board receive relevant cyber, information and security training.

- Managing cybersecurity risks and enhancing cyber threat awareness across the organization is a shared responsibility between our business units and corporate functions, with the Bank's Operational Risk Oversight Committee and Enterprise Risk Management Committee providing senior executive oversight, direction and guidance. Our businesses drive cyber risk management within their own businesses, and TD's cyber leadership monitors the cyber threat landscape, our technology and cyber risk profile, and emerging risks and roadmaps to help keep our cybersecurity profile current.

Threat Monitoring

- TD has cyber intelligence, analytics, crisis management and operations teams dedicated to monitoring, detecting, understanding, analyzing and responding to threats, and assessing their likelihood and the impact they may have on our business operations, infrastructure and colleagues.
- We have a global Fusion Centre model that includes 24/7 coverage in a "follow-the-sun" model for cyber intelligence, physical protection, analytics and crisis management. Our operations teams monitor, detect, analyze and respond to threats, and consistently assess the likelihood of these threats and the impact they may have on our business operations, infrastructure and colleagues.

Resource Corner

- [Data Security and Privacy Data](#)
- [How We Protect You \(Privacy and Security\)](#)
- [TD Privacy Policy](#)
- [TD U.S. Privacy Notice](#)
- [Europe and Asia-Pacific Privacy Notice](#)
- [TD Global Investment Solutions Privacy & Security](#)
- [Protect Yourself Against Fraud](#)



Protect

Data Security and Privacy continued

Industry Frameworks and Leadership

- We recognize the criticality of utilizing and adhering to industry-standard frameworks for cybersecurity. We align our information security program, core functions and capabilities to the National Institute of Standards and Technology (NIST) Cybersecurity 2.0 Framework (CSF). Additional frameworks such as the Information Technology Information Library (ITIL), Control Objectives for Information and Related Technology (COBIT), and International Organization for Standardization (ISO) 27002 are reviewed and applied, where necessary, to help ensure comprehensive coverage. We align our control requirements with, and are independently assessed annually against, the NIST CSF, and make continued enhancements to support a robust defence against cyber threats.
- TD participates in industry and information security forums and organizations that facilitate knowledge sharing, learning, networking and intelligence gathering to strengthen our programs and the financial services sector more broadly.
- Global organizations like the Financial Services Information Sharing and Analysis Center (FS-ISAC), and the Canadian Anti-Scam Coalition (CASC), connect members from across financial, technology and telecommunication industries with government and law enforcement to enhance TD's overall resilience against scams and threats.

Talent Development

- TD is building a resilient, future-ready cybersecurity organization by combining targeted hiring and broad-based colleague development. In recent periods, we strengthened leadership with talent that brings global systemically important bank (G-SIB) experience to key executive roles, enhancing our ability to meet industry standards. In parallel, TD's Global Security and Defence (GSD) talent strategy focuses on attracting, developing and retaining a world-class team while building a cyber- and regulatory-adept workforce. Together, these efforts support our commitment to digital trust, technology resilience and sound governance.
- We work with the Executive Women's Forum (EWF) to develop cyber talent and strengthen our talent pipeline. EWF is a leadership and learning community that aims to help advance the careers of women in the areas of information security, information technology risk management and privacy, with a growing focus on areas such as machine learning and artificial intelligence.
- TD works with the Joint Economic Development Initiative (JEDI), supporting Indigenous students in Fredericton, New Brunswick as they build careers, strengthen their cybersecurity skills and pursue lifelong learning.
- TD supports talent and event programming offered by the Black Professionals Technology Network (BPTN).

Enhancing Privacy

Governance and Policy

- The Privacy Office, together with other risk and control partners, provides guidance and risk-based assessment of the practices of TD businesses regarding applicable privacy laws and regulations. It also provides risk-based oversight of compliance with our privacy program and the applicable privacy laws, rules and regulations.
- The Vice President (VP) and Global Chief Privacy Officer, in collaboration with other stakeholders within the Bank, oversees TD's privacy program. Privacy officers are engaged in the jurisdictions where the Bank operates.

Training and Culture

- All colleagues have a role in supporting TD's compliance with applicable privacy laws. TD's annual mandatory privacy training aims to provide colleagues with the knowledge and skills they need to help protect client and colleague personal information appropriately, to understand their privacy obligations and to conduct day-to-day business activities in a privacy-focused manner.

Regulatory Frameworks

- The Privacy Office monitors new or amended privacy-related legal requirements and, where required, provides guidance on their applicability to TD's businesses. This includes consultations and proposed updates to Canadian, U.S., European and Asia-Pacific privacy laws.

Industry Best Practices

- The Privacy Office maintains relationships with applicable industry associations and participates in advocacy related to privacy law reform.

Client Awareness

- TD strives to have clear and accessible privacy commitments that inform our clients of the ways in which we help protect their privacy and the confidentiality of information and explain how we handle client information, including handling by third parties. Where appropriate, we provide clients with choices that balance their expectations with legitimate business needs and the requirements of applicable privacy laws.
- We are focused on maintaining and investing in privacy and enhancing mechanisms for transparency and choice.



Protect

Client Experience and Protection

Our Approach

Our promise to our clients is to be remarkably human and refreshingly simple in every interaction and experience. We are committed to providing financial products and services to clients in the communities we serve with transparency and clear and simple information. We continue to adapt the Bank’s processes to help meet and exceed evolving client expectations and preferences while creating value and providing trusted advice. TD strives to offer seamless and personalized client interactions across our channels and businesses, providing our clients with solutions that meet more of their financial needs.

Our Approach in Action

Measuring the Experience

One key measurement TD uses to evaluate client experience is its Legendary Experience Index (LEI), which measures client experience and drives insights to help us improve that experience in the moments that matter most to clients. TD continues to invest in research, technology infrastructure, digital tools and platforms, artificial intelligence (AI) and other new technologies and solutions with the goal of anticipating and/or exceeding market and client needs.

Target	2025 Result	2026 Target ¹
Deliver Legendary Client Experience – Legendary Experience Index (TD Composite Score) ² (75.15 for 2025)	76.59	76.15

¹ As customer interaction channels and touchpoints continue to evolve, we have embraced the best practices by reviewing and updating the composition of the TDBG Composite annually to reflect how customers engage with us, including the addition or retirement of interaction channels. As a result, year-over-year comparisons are not advisable.

² LEI is calculated by a third party based on independent client experience surveys shared regularly with clients in Canadian Personal Banking, TD Bank U.S., TD Wealth, TD Insurance and Canadian Business Banking. The surveys ask clients to rate their recent experiences with TD on a 10-point scale to indicate how exceptional they found the service (weighted at 70%) and how likely they would be to do additional business with TD in the future based on that experience (weighted at 30%). The percentage of the top-two box responses (scores of 9 or 10) for each question is weighted and summed to calculate the LEI score for each program. The results of each program are aggregated to form the business Composite LEI score, which is then further combined – based on their contribution to net income after tax over the past four fiscal years – to determine the overall TD Bank Group Composite LEI score.

Accessibility at TD

- In consultation with clients, colleagues and community members with disabilities, TD published an [Accessibility Plan](#) in 2023 detailing how we work to identify, remove and prevent barriers to accessibility in Canada.
- We published our second Accessibility Progress Report on the Accessibility Plan in 2025, which is available on our updated [Accessibility website](#). An executive summary is available in American Sign Language (ASL) and Quebec Sign Language (LSQ).



Resource Corner



[Client Experience and Protection Data](#)

[Codes of Conduct and Public Commitments](#)

[Accessibility at TD](#)

[Resolving Your Complaints](#)

[Senior Customer Complaints Office \(SCCO\)](#)

[Prohibited Conduct Rules for Banks – What You Need to Know](#)

[2025 Public Accountability Statement – Seniors Code \(p.16-18\)](#)



Protect

Client Experience and Protection continued

Protecting Our Clients

Our Code of Conduct reinforces our commitment to integrity, transparency, and responsible business practices, and helps ensure that every member of the organization acts in a manner that complies with applicable laws and regulations and operates within our risk appetite. Our Code of Conduct prohibits employees from discriminating against current or potential customers, clients, or vendors with respect to protected characteristics, including race, gender, age, or religious affiliation or on the basis of political affiliation.

For additional information about how we promote responsible practices among our colleagues, and adherence to our Code of Conduct and Ethics, see the [Corporate Governance and Integrity](#) section.

Canada

TD is guided by the Financial Consumer Protection Framework, which aims to promote responsible conduct across Canadian banks and protect retail banking clients. It emphasizes transparency to empower clients to make informed decisions, and includes provisions for fair and equitable practices, such as requirements for cancelling agreements, access to basic banking services and complaints processes. See our [Public Accountability Statement](#) for information about access to banking and how we support the financial needs of seniors through implementation of the Seniors Code.

United States

TD Bank U.S.' Fair & Responsible Banking Policy supports TD Bank U.S.' commitment to treating all individuals fairly and equitably in offering and providing banking products and services in order to

mitigate risk to the consumer, to prevent discriminatory practices and unfair, deceptive or abusive acts or practices (UDAAP), and to maintain compliance with applicable federal and state laws and regulations. TD Bank U.S.' intent is to be informative and forthright about products and services and to comply with federal and state laws and regulations governing fair lending and the prevention of UDAAP. TD Bank U.S. maintains a cross-functional framework for clients, business lines and channels that helps to identify and address client issues and continues to enhance legendary client experience.

Resolving Client Complaints

Our goal is to provide high-quality service and trusted advice to clients. When complaints arise, our focus is on resolving the issue at the first point of contact with empathy, fairness and thoughtful solutions.

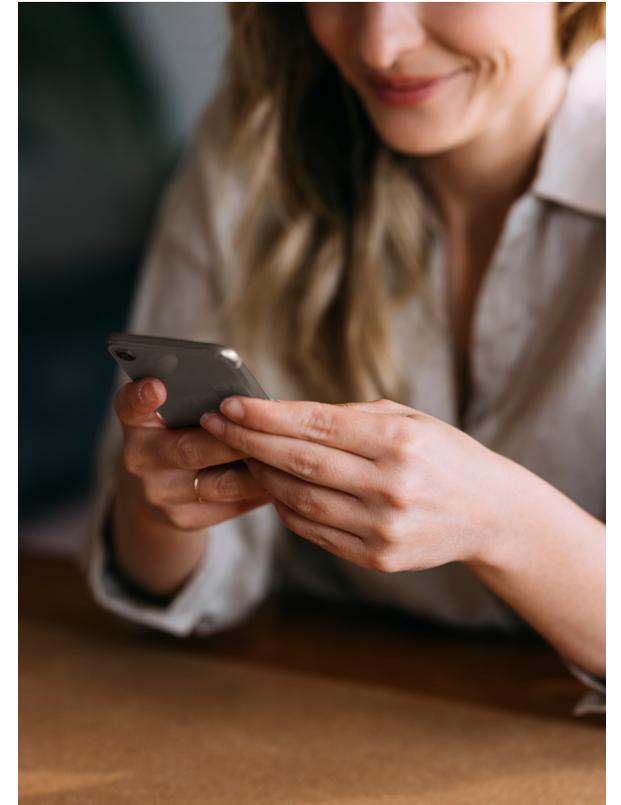
Canada

In Canada, if a client is not satisfied with the resolution at the first point of contact, they can escalate the matter to TD Customer Cares. If the complaint remains unresolved, the client can then escalate it to the Senior Customer Complaints Office (SCCO). Complaints escalated to the SCCO are often more complex in nature than those complaints addressed at the first point of contact. In 2025, the top SCCO complaint themes were consistent with those of the prior year; they related to possible scams (e.g., investment, employment and wire scams) and home and auto insurance claims (e.g., disputes over settlements and declined claims).² Our Enterprise Customer Complaints Initiative, launched in 2023, continues to focus on leveraging client feedback and data trends to

identify root causes in order to address the top client experience opportunities, prevent future complaints and help improve the overall complaints experience. Over the past three years, we have focused on identifying root causes and fixing issues in our systems and processes to help make them easier and simpler for clients and colleagues.

United States

In the United States, the Customer Advocacy and Insights team is responsible for complaint management and maintains a cross-functional framework for clients, business lines and channels. The primary drivers of complaints in 2025 were customer service, transactional issues, and policy/authentication adherence. Customer Advocacy creates detailed reporting to allow product teams, distribution channels and risk partners to review data trends and perform root cause analysis to identify potential risks and client experience opportunities. TD Bank U.S. continues to deliver changes through the Exceptional Pride to Inspire Legendary Customer Experiences, or "EPICx" program, launched in 2023, which tracks the solutions being implemented to help improve the client experience.





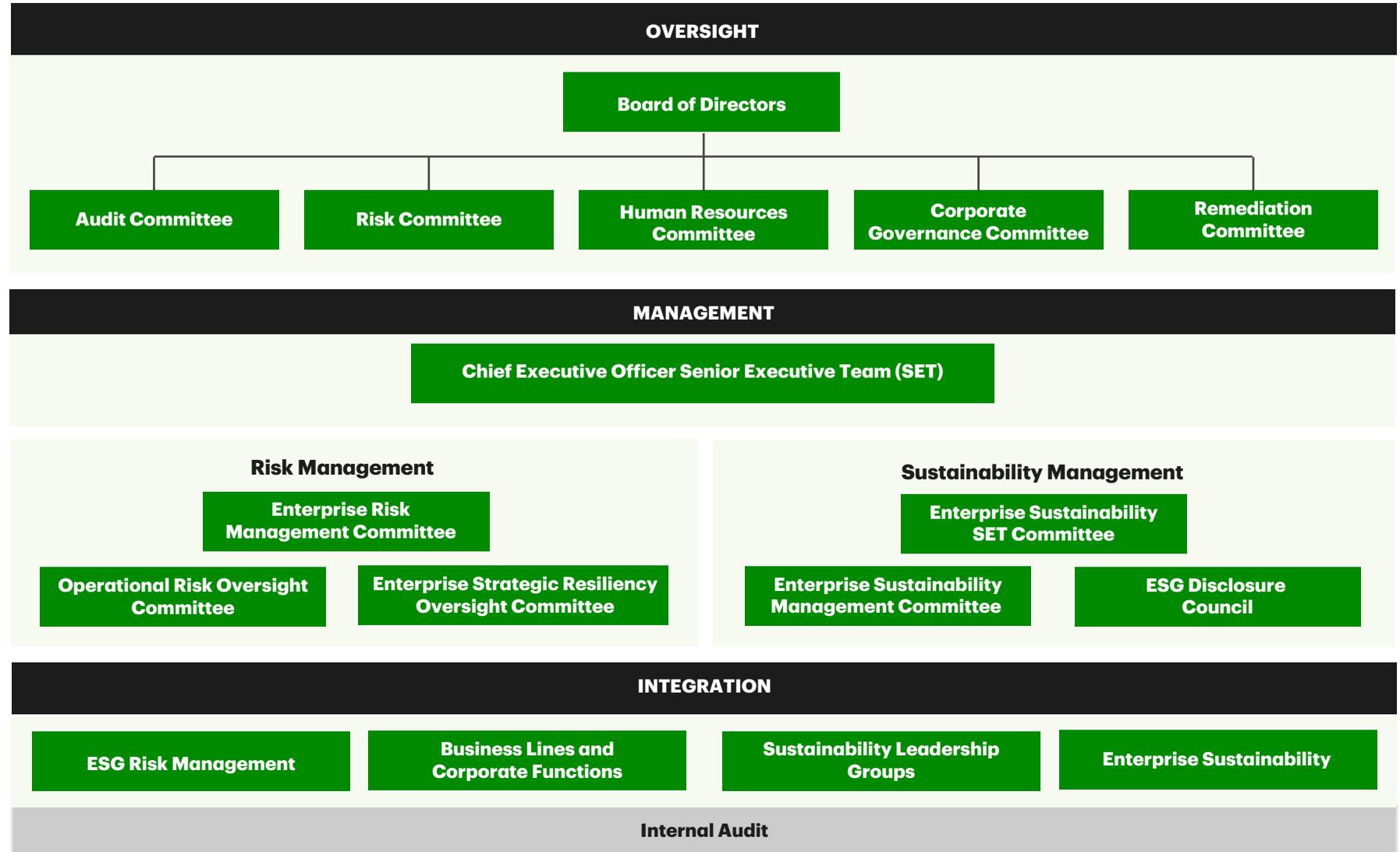
Adapt

Sustainability Governance

TD continues to adapt governance structures, executive compensation and business and segment strategies to embed sustainability considerations and expertise.

The following outlines the Bank's executive-level risk governance structure and the sustainability and business-level management committees that work to integrate sustainability governance and strategy across the organization.

Information about how ESG factors link to Executive Total Rewards is available in our [2026 Management Proxy Circular](#).





Adapt

Sustainability Governance continued

Leadership Oversight of Sustainability

TD's Board and the Corporate Governance Committee of the Board provide oversight of the Bank's strategic approach to sustainability, including climate-related risks and opportunities, and engage with management on sustainability topics, including climate, throughout the year.

All newly elected members of the Board of Directors receive an orientation on sustainability, with continuing education opportunities provided. For information about the Board of Directors' engagement on sustainability matters, refer to the [2026 Management Proxy Circular](#).

TD's Chief Executive Officer (CEO) is ultimately accountable for the execution of the TD Sustainability Strategy, including the TD Climate Action Plan. The Enterprise Sustainability SET Committee (ESSC) – which consists of members of the Senior Executive Team (SET) from our lines of business and corporate functions – oversees and advises on sustainability, including climate, strategy development and management across TD. In addition, our management committees and councils provide oversight and support management accountability for our sustainability efforts, and guide, challenge and advise on existing and emerging E&S risks and opportunities, including climate.

Groups Responsible for ESG Risk Management at TD

Responsible Body	Responsibilities
Oversight Committees	
Risk Committee of the Board (Risk Committee)	The Risk Committee is responsible for reviewing and approving the Enterprise Risk Framework (ERF) and related risk category frameworks and policies that are designed to help manage the Bank's risk exposures. The Committee also reviews and recommends the Enterprise Risk Appetite Statement for approval by the Board annually. In addition, the Committee oversees the management of TD's risk profile and performance relative to its risk appetite. In support of this oversight, the Committee reviews and approves significant enterprise-wide risk management frameworks and policies, provides a forum for a comprehensive analysis of an enterprise view of risk including consideration of trends, and current and emerging risks.
Management Committees	
Enterprise Risk Management Committee (ERMC)	The ERMC, chaired by the CEO, oversees the management of major enterprise governance, risk and control activities at TD with a view to understanding significant existing and emerging risks, and their impact on the Bank's risk profile and earnings. In addition, the Committee reinforces an integrated and effective risk management culture within TD.
Operational Risk Oversight Committee (OROC)	The OROC, chaired by the Chief Risk Officer (CRO), oversees the identification, monitoring and control of key risks within the Bank's operational risk profile, and is supported by ongoing activities and reporting of TD's governance, risk and control functions.
Enterprise Strategic Resiliency Oversight Committee (ESROC) ¹	The ESROC, chaired by the CRO, provides senior executive oversight, direction and guidance on strategic and related risks arising from the planning and execution of TD's strategies and associated activities.
Centrally Driven Functions	
ESG Risk Management (ESG RM)	Establishes and communicates enterprise governance, environmental, climate, and social risk and strategies, frameworks and policies for business and corporate functions to identify, manage, measure and monitor current and emerging environmental, climate and social risks in day-to-day activities, operations, products and services. Internal policies and procedures require business and corporate segments to consider the applicability and assessment of E&S risk in current and new business activities. Business unit governance and processes are required to incorporate an assessment of E&S risk and apply an appropriate level of governance and oversight, consistent with their business procedures. ESG RM also develops enterprise-wide tools, programs and training to support identification, measurement, management and monitoring of E&S risk.

¹ The ESROC became effective in fiscal 2026 when its predecessor committee was dissolved, prior to the publication of this report.



Adapt

Sustainability Governance continued

Groups Responsible for Integrating Sustainability Governance and Strategy at TD

Responsible Group	Responsibilities
Management Committees and Councils	
Enterprise Sustainability Senior Executive Team (SET) Committee	<ul style="list-style-type: none"> Oversees and advises on sustainability strategy development and management across TD. Chaired by the Chief Corporate Affairs Officer, comprised of members of TD’s SET. The Committee serves as a forum for information sharing, discussion and providing advice on topics and opportunities related to TD’s sustainability strategies and framework, and on emerging matters.
Enterprise Sustainability Management Committee	<ul style="list-style-type: none"> Oversees the management of sustainability strategy-related decision-making, the sustainable finance strategy and sustainability-related targets.
ESG Disclosure Council	<ul style="list-style-type: none"> Provides senior executive oversight, direction and guidance on sustainability disclosures. The council’s mandate is to advise, challenge and, where appropriate, approve or endorse sustainability disclosures.
Centrally Driven Functions	
Sustainability Leadership Groups	<ul style="list-style-type: none"> Oversee the execution of the Sustainability Transition Program, supporting the planning and execution of the following workstreams: Line of Business Sustainability Strategy, Sustainability Regulatory Reporting, E&S Data Technology and Analytics, E&S Risk Management, E&S Education/Training Program, and Enterprise Sustainability Strategy Refresh. Workstreams are comprised of subject matter experts with shared ownership of driving progress against defined deliverables.
Enterprise Sustainability	<ul style="list-style-type: none"> Manages the governance, implementation and execution of the Enterprise Transition Program and its related initiatives. Leads development of the enterprise climate strategy, provides enterprise guidance, analysis and communication for Climate Action Plan elements, including metrics and targets, and champions their development and implementation within the enterprise. See the TD Environmental Approach section for more information. Leads the Bank’s social strategy at the enterprise level in partnership with businesses and corporate functions across the organization. This team is focused on improving economic inclusion and the Bank’s disclosures related to human rights. See the TD Social Approach section for more information. Leads the development of the enterprise sustainable finance strategy and sustainable finance targets, and works with businesses to identify sustainable finance activities in the focus areas of TD’s Sustainability Strategy. See the Sustainable Finance section for more information. Leads the Bank’s sustainability and climate reporting and public disclosures.

Adapt

Sustainability Governance continued

Enterprise Sustainability Transition Program

TD established an Enterprise Sustainability Transition Program (ESTP) in 2024 to simplify and strengthen its enterprise-wide governance, coordination and reporting of sustainability initiatives, and drive alignment of regulatory requirements, business objectives and stakeholder expectations.

The ESTP, led by Enterprise Sustainability, helps the Bank's lines of business and corporate functions manage sustainability-related risks in order to protect the Bank, build capabilities to adapt the Bank, and identify and realize sustainability-related opportunities to grow the Bank.

Oversight and Governance

The ESTP brings together the mandates and processes of legacy sustainability committees, councils and forums to operate with simplicity and speed, and be disciplined in execution. This strategic consolidation helped streamline our internal organization, leverage existing expertise, and refine our governance practices to further position TD to meet its sustainability objectives.

Sustainability Program Workstreams

The ESTP has membership from lines of business, corporate functions and subject matter experts, who work together on defined deliverables across priority workstreams. Workstreams are regularly evaluated to refine their focus. In 2025, the ESTP ran six workstreams:

1. **Business-specific Sustainability Plan Development** – Developing plans to address business-specific sustainability risks and opportunities aligned to business objectives.
2. **Sustainability Regulatory Reporting** – Building capabilities and reporting for sustainability-related disclosures in line with current and future regulatory requirements.
3. **E&S Data, Technology and Analytics** – Building internal infrastructure, data and modelling capabilities to strengthen measurement and reporting capabilities for regulatory submissions.
4. **E&S Risk Management** – Integrating the short-, medium- and long-term impacts of E&S risks into our risk and control frameworks and risk management processes.
5. **Sustainability Education and Training Management** – Supporting the ongoing development and implementation of education and training across the enterprise to help TD colleagues better understand the role of sustainability in helping to protect, adapt and grow the Bank.
6. **Enterprise Sustainability Strategy Refresh** – Continuing work to streamline TD's Sustainability Strategy and associated focus areas, metrics and targets; in 2026, this work will be guided by the results of a comprehensive materiality assessment.





Adapt

Sustainability Governance continued

Sustainability Education and Development

Colleague Training and Education

As part of the ESTP, an enterprise cross-functional workstream was created to support TD's sustainability education initiatives, including climate education. We are enhancing our Bank-wide approach to providing learning and development opportunities related to sustainability and climate change. Below are a few examples:

- **Sustainability Education Forum:** This forum brings together leaders from across the organization to share knowledge and best practices, fostering a culture of sustainability. By leveraging expertise from Enterprise Sustainability, lines of business and subject matter experts, the forum empowers leaders with resources and learning to help advance sustainability. This helps equip our business lines to drive positive impacts for the Bank, as well as our clients and the communities we serve.
- **Sustainability Learning Sessions:** Launched in 2023, these quarterly sessions cover a variety of topics to help increase knowledge of sustainability, including climate topics such as measuring and addressing methane emissions and sustainable finance, with participation by colleagues from across the enterprise, including Enterprise Sustainability, ESG Risk Management, corporate functions and lines of business.

- **E&S Risk Management and Strategy Forum:** This forum provides a regular touchpoint for Enterprise Sustainability, ESG Risk Management and partners across first and second lines of defence to share information, discuss activities and review leading practices to support the Bank's strategic resiliency as it relates to sustainability, including climate.
- **Ongoing Engagement:**
 - ESG Risk Management regularly engages with colleagues and executives through existing forums, committees, and business-as-usual meetings, helping to embed ongoing education about climate risk management in the Bank's risk management practices.
 - In 2025, training was provided to TD Securities and TD Asset Management to enhance existing capabilities and expand subject matter expertise.

Growing Our Talent Pipeline

An important avenue for building sustainability capabilities is recruiting and developing sustainability-focused talent. Our Early Talent programs introduce current or recent graduates to a variety of sustainability-focused roles while enabling learning and networking opportunities.

ESG Associate Program

In 2021, the Enterprise Sustainability group, in partnership with Enterprise Risk Management, introduced a two-year rotational ESG Associate program to attract and retain graduate professionals to support our sustainability work across the enterprise. Participants develop broad experience and knowledge in different sustainability areas of the Bank and are provided with a holistic view of how our Sustainability Strategy is developed and operationalized, as well as how our climate-related risks are managed.

Co-ops and Internships

TD also offers co-op and internship positions to support sustainability-related work across various corporate functions, such as Enterprise Sustainability, Enterprise Risk Management and Finance, as well as business groups, such as Canadian Personal Banking, Business Banking, TD Securities, TD Insurance and TD Asset Management. Participants can develop new skills, gain new perspectives, and make an impact at work and in the community, such as through colleague volunteering. In addition, these positions offer opportunities for career advancement through regular development conversations, training programs and mentorship.

We are continuing to build expertise and knowledge to better support customers and clients as they navigate their sustainability journeys. This involves hiring the right talent and enhancing sustainability expertise within our lines of business.



Grow

Sustainable Finance

Our Approach

Sustainable finance refers to financial activities that consider ESG factors as a means of promoting long-term economic growth and financial system stability.³

As a large North American financial institution, we have a role in supporting the development of a sustainable economy. TD’s Sustainable Finance Strategy, the foundation of our TD Sustainability Strategy, is designed to support the growth of sustainable finance through the mobilization of capital, market participation, and the building of supporting infrastructure and capabilities.

The Enterprise Sustainability Management Committee (ESMC) oversees the management of sustainability strategy-related decision-making, sustainable finance strategy and sustainability-related targets. For more information about the ESMC, see the [Groups Responsible for Integrating Sustainability Governance and Strategy at TD](#) chart. In 2025, we continued to enhance our sustainable finance-related talent pipeline and build capabilities across the enterprise.

In March 2023, TD announced it had established a \$500 billion by 2030 Sustainable & Decarbonization Finance Target (“the Target”). During 2025, we contributed approximately \$79.4 billion to the Target, bringing the cumulative amount contributed to more than \$225.3 billion to date.⁴ The Bank’s sustainable finance strategy supports efforts to meet the Target by helping us track certain eligible business activities of the Bank that fit within the eligible categories of the Target,⁵ as defined in the [TD Sustainable & Decarbonization Finance Target Methodology](#) (“the Methodology”).

In 2024, TD Bank U.S. launched its Community Impact Plan (CIP), providing an estimated US\$20 billion to support lending, banking access and other activities for the benefit of the communities we serve. Since CIP activities are aligned with our sustainability priorities, they are eligible for inclusion toward the Target. Activities that intend to satisfy Community Reinvestment Act (CRA) criteria are also eligible for inclusion toward the Target.

Sustainable Finance Strategy



Mobilization

Evolve our products and services to meet client demand



Engagement

Be an active participant in the sustainable finance market to support growth



Integration

Establish the tools, resources and processes to embed sustainable finance across the Bank to support long-term growth

Resource Corner

[Sustainable Finance Data](#)

[TD Sustainable & Decarbonization Finance Target Methodology](#)

[TD Securities Sustainable Finance and Advisory](#)

[TDAM Sustainable Investing and ESG Integration](#)

[TDAM Sustainable Investment and Climate Report](#)

[2025 TD Insurance Principles for Sustainable Insurance – Annual Disclosure](#)



Grow

Sustainable Finance continued



We regularly review the Methodology against developments in the market. TD recognizes the ongoing development of methodologies and guidance for sustainable finance targets, such as the Canadian Green and Transition Taxonomy. We considered a variety of available standards, guidelines and industry practices to inform the Methodology where possible, including but not limited to the International Capital Market Association (ICMA) Green Bond Principles, Social Bond Principles, Sustainability Bond Guidelines, and Sustainability-Linked Bond Principles; the Climate Bonds Taxonomy of the Climate Bonds Initiative; the Loan Market Association and Loan Syndications and Trading Association Sustainability-Linked Loan Principles; and the International Energy Agency’s (IEA) Net Zero Emissions (NZE) by 2050 Scenario. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for further details and our approach, and the [TD Environmental Approach](#) section for more information about TD’s external engagement, including engagement on sustainable finance.

Target	Cumulative Result from 2023	2025 Result	2024 Result
\$500 billion by 2030 supporting eligible ¹ environmental, decarbonization and social activities through lending, financing, underwriting, advisory services, insurance and the Bank’s own investments	\$225.3 billion	\$79.4 billion	\$76.4 billion

¹ For more information, see the [TD Sustainable & Decarbonization Finance Target Methodology](#)



Grow

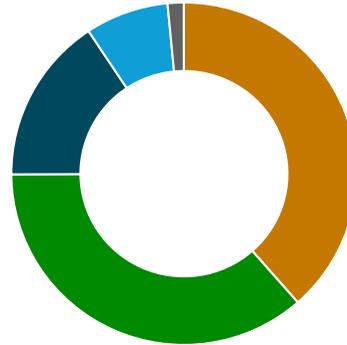
Sustainable Finance continued

Progress Toward Our \$500 billion Sustainable & Decarbonization Finance Target

In 2025, TD's contribution toward the Target totalled \$79.4 billion, up \$3.0 billion from 2024. This increase is largely attributable to greater contributions in the environment category. Looking forward, we expect new decarbonization opportunities to arise, such as through technological innovations and clients pursuing their own emissions reduction plans.

Importantly, TD does not make business decisions based on whether the particular business activity will be eligible for inclusion toward the Target. TD determines the eligibility of a particular business activity toward the Target only after undertaking the regular business decision-making process.

2025 Business Activities (in billions)



Commercial, Corporate and Retail Lending ¹	\$30.6
Capital Markets ²	\$28.9
Advisory Services	\$12.5
Treasury Investments ³	\$6.2
Other ⁴	\$1.2
Total⁵	\$79.4

¹ "Commercial, Corporate and Retail Lending" includes \$22.2 billion in environmental, social and decarbonization lending and \$8.4 billion in sustainability-linked lending; see our [Methodology](#) for more information on these categories.

² "Capital Markets" includes \$23.7 billion in Debt Capital Markets and \$5.2 billion in Equity Capital Markets. "Debt Capital Markets" includes \$6.2 billion in green bond underwriting, \$2.6 billion in social bond underwriting, \$13.2 billion in sustainability bond underwriting, and \$1.7 billion in other debt activities; see our [Methodology](#) for more information on these categories.

³ "Treasury Investments" includes green, social and sustainability bond purchases held on the Bank's balance sheet. The figure shown above includes bond purchases made during fiscal 2025.

⁴ "Other" includes principal investments, insurance premiums, tax credit investments, and corporate spending.

⁵ The Sustainable & Decarbonization Finance Target does not include TD Asset Management, TD Epoch, philanthropic activities under The TD Ready Commitment, or investments held by TD clients.

Eligible Categories (in billions)	2025
Environmental Total	\$19.6
Renewable Energy	\$11.8
Clean Transportation	\$3.0
Environment Multi-Sector ¹	\$0.4
Other Environment ²	\$4.4
Decarbonization Total	\$0.6
Nuclear Energy ³	\$0.4
Decarbonization Multi-Sector ⁴	\$0.2
Social Total	\$25.0
Access to Essential Services: Health Care	\$11.6
Affordable and Community Housing ⁵	\$8.0
Social Multi-Sector ⁶	\$4.9
Other Social ⁷	\$0.5
Multi-Sector and Thematic Total ⁸	\$34.2
Total	\$79.4

¹ "Environment Multi-Sector" includes activities that satisfy two or more eligible environmental inclusion categories. This includes business activities such as green bond underwriting and treasury investments in green bonds.

² "Other Environment" includes "Energy Efficiency," "Green Buildings," "Environmentally Sustainable Management of Living Natural Resources and Land Use," "Sustainable Water and Wastewater Management" and "Pollution Prevention and Control" activities.

³ According to the IEA, See our [Methodology](#) for information on the inclusion criteria as it relates to nuclear energy.

⁴ "Decarbonization Multi-Sector" includes activities that satisfy two or more eligible decarbonization inclusion categories.

⁵ "Affordable and Community Housing" progress includes housing supply activities that are also included toward the \$12 billion by 2030 Affordable Housing Target.

⁶ "Social Multi-Sector" includes activities that satisfy two or more eligible social inclusion categories. This includes business activities such as social bond underwriting and treasury investments in social bonds.

⁷ "Other Social" includes "Affordable Basic Infrastructure," "Access to Essential Services: Education" and "Socioeconomic Advancement and Empowerment" activities.

⁸ "Multi-Sector and Thematic" includes activities that satisfy two or more of the eligible environmental, decarbonization or social categories, Thematic Activities as defined in the [Methodology](#) and activities designed to qualify for credit under the Community Reinvestment Act and/or TD Bank, National Association (TDNA) Community Impact Plan that do not directly align with the other categories.



Grow

Sustainable Finance continued

Sustainable Finance Highlights Across Our Business

TD Securities

The TD Securities Sustainable Finance & Advisory group provides ESG advisory and financing solutions across Corporate and Investment Banking and Global Markets, collaborating with partners across TD Securities to support the implementation of sustainability and decarbonization strategies in the public and private sectors. The group offers:

- Over a decade of experience providing sustainable financing solutions, including support for structuring green, social, sustainability and sustainability-linked (GSSS) bonds, loans and other debt products.⁶
- Advisory services and market perspectives, delivered through sustainability advisory and related due diligence and positioning on mergers and acquisitions and equity transactions, pre- and post-IPO ESG ratings assessments and ESG reporting guidance.
- Carbon trading including liquidity solutions for compliance and voluntary carbon markets.⁷

Case Study: TD Securities – Advising Digital Infrastructure Clients on Sustainable Financing

With the rapid growth of digital infrastructure, including AI, cloud computing, and data centres, there is heightened focus on how companies scale responsibly, particularly in managing sustainability factors such as energy efficiency and natural resource consumption. TD Securities continues to demonstrate leadership in supporting digital infrastructure clients looking to embed sustainability into their financing instruments, offering a comprehensive suite of sustainability-aligned products, including sustainability-linked loans (SLLs) and bonds (SLBs), green, social and sustainability (GSS) loans and bonds, and securitizations. These solutions help clients align capital structures with sustainability objectives and access the sustainable capital markets with enhanced credibility.

In 2025, TD Securities ranked first among global underwriters for USD sustainable digital infrastructure leveraged loans and second among global underwriters of sustainable asset-backed securities (ABS) for data centre issuers, according to Bloomberg. This includes acting as Sustainability Structuring Agent and/or Joint Bookrunner roles on more than US\$7 billion in green securitizations for digital infrastructure clients prioritizing energy efficiency and resource management, attracting sustainability-focused investors and enabling favourable financing terms. TD Securities also served as structuring agent in the sustainability-linked loan market, incorporating performance-based pricing adjustments tied to operational efficiency metrics. In 2025, TD Securities served as a Sustainability Structuring Agent and Lead Arranger on US\$17 billion total notional value of green and sustainability-linked loans for digital infrastructure clients.





Grow

Sustainable Finance continued

TD Asset Management

TD Asset Management Inc. (TDAM) directs approximately \$484 billion in assets under management on behalf of retail and institutional investors as of October 31, 2025. TDAM offers a diversified suite of investment solutions to corporations, pension funds, endowments and foundations. In addition, TDAM manages assets on behalf of retail investors through affiliated and third-party dealers, and offers a broadly diversified suite of investment solutions, including mutual funds, exchange-traded funds and professionally managed portfolios.

- TDAM's approach to sustainable investing is aligned with the six principles set out by the [Principles for Responsible Investment \(PRI\)](#) and is grounded in three core activities: 1) integration, 2) stewardship (engagement and proxy voting) and 3) thought leadership. TDAM has been a signatory to PRI since July 2008.
- TDAM's approach aligns with its philosophy of serving its securityholders' investment goals and adhering to its fiduciary duty as an asset manager. For example, incorporating material ESG considerations within the investment framework and for applicable investments is one way in which TDAM furthers its goal of seeking to provide strong risk-adjusted returns.

- As of October 31, 2025, 97% of active equity funds managed by TDAM were rated as in-line or better than their corresponding benchmark based on the MSCI ESG Quality Rating.⁸
- TDAM's investment teams conducted thematic ESG-related research with a cross-sector focus. See the [TD Environmental Approach](#) section for thought leadership pieces authored in 2025.

For more information on TDAM's approach to stewardship and ESG integration, visit the [TDAM Sustainable Investment website](#).

TD Insurance

Extreme weather events continue to have an impact on jurisdictions where the TD Insurance group of companies ("TD Insurance") conducts business, directly affecting the communities it serves. In 2025, the Bank disclosed losses relating to catastrophe claims.⁹ Quarterly results of catastrophe claims can be found on TD's [Investor Relations website](#). TD Insurance plays an important role in helping clients find the right coverage for their risks. Details of TD Insurance's engagement can be found in the [TD Environmental Approach](#) section of this report and in [TD Insurance's Principles for Sustainable Insurance – Annual Disclosure](#).

Examples of TD Insurance's approach to sustainability include:

- **Enhanced Home Coverage:** TD Insurance's Enhanced Home Coverage includes additional protection to cover the extra costs of buying products/materials that are more weather-resilient, or that have potential environmental benefits, when making repairs. Clients can use this protection to install items such as hail-resistant shingles, LED lighting, high-efficiency furnaces or reclaimed wooden boards, up to an extra 10% over the amount of their claim (up to \$50,000).
- **Climate Resilience:** TD Insurance continues to promote the resiliency of its clients and communities in the face of climate change and climate-related risks by providing information about adaptation measures, along with incentives for clients to rebuild strategically after a claim to mitigate future climate-related risks. See the [TD Environmental Approach](#) section for more details.
- **Bumper Cover Recycling:** TD Insurance continued its bumper cover recycling program at all eligible TD Insurance Auto Centres in Canada. In 2025, 27,875 plastic bumper covers (an increase of 6,789 covers from 2024) were transferred to be recycled (approximately 80% of total).

Case Study: TD Insurance

TD Insurance recently celebrated 10 years as a signatory to the United Nations Environment Programme's Financial Initiative Principles for Sustainable Insurance (UNEP FI PSI). Members of the TD Insurance Sustainability team co-chaired and participated in the UNEP FI PSI Working Group for Nature, a multi-stakeholder platform that develops strategies and technical guidance to address nature-related risks and opportunities within insurance underwriting.

In 2025, the PSI Working Group for Nature published [Rooted in Risk](#), the first in a series of foundational guidance documents for the global insurance industry. The "Nature Uncovered for Insurers" series seeks to address a critical gap in guidance on nature-related assessments by providing tailored guidance for insurance underwriting portfolios, empowering insurers to take proportionate and effective action toward a nature-positive and resilient future.



Sustainable Finance continued

TD Treasury and Balance Sheet Management

Sustainable Financing Framework

Sustainable financing instruments are issued in accordance with [TD's Sustainable Financing Framework](#). TD received a second-party opinion which demonstrates alignment with the International Capital Market Association principles and guidelines.

Sustainable Bond Issuances

TD issued a US\$500 million three-year green bond in December 2023, led by a syndicate of underwriters.¹⁰ This was TD's fifth sustainability-themed bond, bringing its total sustainability bond issuances to approximately \$3.7 billion. See the [2025 TD Sustainable Financing Report](#) for examples of projects funded through our green bonds.

TD Bond Investments

TD maintains a target to hold \$15 to \$20 billion in green, social, sustainability and pandemic bonds^{11,12} in its treasury investment portfolio by the end of 2025, measured using an as-at approach.¹³ This target was set in partnership by the Treasury and TD Environment teams, based on the Bank's approach to applying ESG principles to investment activities, and was approved by senior leaders in Treasury.

As of October 31, 2025, these bond holdings amounted to approximately \$22.2 billion¹⁴ (approximately \$23.9 billion as of October 31, 2024). The balance as of October 31, 2025 is lower than the prior year, primarily due to maturities.

TD launched new initiatives and products, and enhanced existing ones, that are designed with the aim of having a positive impact on society and the environment. Throughout this report, we highlight our progress across business segments. For examples, see:

- [Financial Access](#) for information about how the Bank provides access to financial products and services for retail and business clients.
- [Housing Access](#) for information about the TD Home Access Mortgage® in the United States and how TD Helps supports clients in Canada facing financial hardship.
- [TD Environmental Approach](#) for information about how TD is working to grow the Bank through products and services that support decarbonization while continuing to meet the evolving needs of all our clients.¹⁵



Protect, Adapt, Grow: Responsible Artificial Intelligence and the TD Sustainability Strategy

TD's approach to responsible artificial intelligence (AI) exemplifies the [TD Sustainability Strategy](#) to Protect, Adapt and Grow the Bank. Through engagement with external stakeholders on AI, TD is developing relationships that help shape the AI ecosystem and influence emerging industry standards.

Our Approach

AI adoption within the financial services industry continues to rise; however, industry standards related to trustworthy AI are still in development. AI, particularly new technologies such as generative AI (GenAI) and Agentic AI, has significant potential to drive efficiency and foster innovation, but also amplifies certain risks related to fairness and accuracy, for example. The trust that our clients place in us is central to our innovation philosophy, and this extends to the technologies we are exploring. TD is committed to innovation and the responsible use of AI to establish its role as a simpler and faster organization. Additionally, we continue to deepen our understanding of the impacts of AI, including emissions, and we will review and refine our strategies to reflect these considerations and align with industry practice as appropriate.



Our Approach in Action

At TD, we are working to leverage AI technology responsibly to develop new approaches, where appropriate, that support our colleagues in their work and our ability to deliver personalized digital experiences to clients. As the Bank develops its AI technology, TD's Trustworthy AI team requires it to be built with a governance framework that includes checks and balances at each step of development. TD's governance approach seeks to address various aspects of **trust**, including **security, transparency, privacy, fairness** and **robustness**.

- Through AI-related governance such as privacy practices, model risk management, and compliance with applicable laws and regulations, we are working to **protect the Bank**, its clients and the communities it serves. While industry standards related to trustworthy AI are still in development and AI-specific regulations are emerging, TD adheres to existing laws, rules and regulations applicable to the development and use of AI.
- We are working to **adapt and grow the Bank** by building our AI-related capabilities to help us work simpler and faster and help shape the future of banking in the digital age. Layer 6 is TD's AI research lab and centre of excellence working to drive the Bank's AI strategy. We register patents regularly and publish insights to demonstrate our growing capabilities to the market. In 2025, we filed 40 patent applications for inventions related to trustworthy AI, helping TD to align AI models with the Bank's values while enhancing the client experience and mitigating risk. On the Evident AI index, out of 50 banks globally, TD ranked fifth in the responsible AI innovation category, fifth for its research and patents, and third for TD's open-source approach.
- We are engaging with external stakeholders such as the U.S. National Institute of Standards and Technology's (NIST) Artificial intelligence Safety Institute Consortium to help shape the AI ecosystem and influence emerging industry standards. TD is also a founding sponsor of the Vector Institute, which supports AI-related research.



Protect, Adapt, Grow: Responsible Artificial Intelligence and the TD Sustainability Strategy continued

Building Human Values in AI

As AI becomes increasingly important to how organizations operate, building the technology on a foundation of human values is key. As the technology evolves, it is critical to TD that AI-generated recommendations align with the Bank’s Responsible AI principles of compliance with applicable laws and regulations, transparency and explainability, data use and privacy, fairness, quality and accountability, reliability and security. It’s important that we understand the opportunities and risks associated with AI technology. We are focused on improving the client experience and protecting clients from day-to-day risks. To do this, TD uses a “human-in-the-loop” approach, where applicable, as one of the controls for TD colleagues to review AI-generated recommendations to determine whether they are appropriate for clients. This approach involves Bank colleagues in making critical AI decisions.

What We Did in 2025

- Launched [TD AI Prism](#), an AI foundation model that will be able to help predict client needs and personalize their banking experiences. TD AI Prism helps TD stay ahead of what our clients need and also turns data into actionable insights. Key features of TD AI Prism include:
 - Personalization – Improves predictive performance by processing 100 times more data variables to understand clients’ needs and their relationships with the Bank. In 2025, the model was operationalized for personalized marketing communication.
 - Accelerated delivery and scalability – A single predictive foundation model will replace many individual models with a single architecture to deliver faster and more efficient AI-driven predictions.
 - Privacy – TD AI Prism was built on the Bank’s secure cloud platform so that client data does not leave the Bank.
- Introduced the [TD Securities AI Virtual Assistant](#) to TD Securities colleagues, as well as the [Wealth Virtual Assistant](#), available to TD Wealth colleagues. TD’s AI Virtual Assistants are proprietary generative AI-powered chatbots, a type of knowledge management system platform designed to synthesize vast amounts of information into concise, context-relevant summaries. These knowledge management systems have also been rolled out to branch and call centre colleagues.
- The TD Trustworthy AI team was recognized by the DataIQ Awards in the category of best responsible AI program or initiative (North America). DataIQ noted TD’s grounded, pragmatic approach to building trust into its AI initiatives, setting an industry benchmark.¹⁶
- Non-Financial Risk Management is implementing an AI Risk Policy that aims to bring an integrated approach to the management of AI risks across the Bank. Model Risk Management (MRM)

designed and implemented a testing framework for validating current GenAI models, including automated Large Language Model (LLM)-assisted or LLM-as-a-judge¹⁷ testing capabilities for Retrieval Augmented Generation (RAG) applications.¹⁸ MRM also incorporated changes into TD’s third-party model risk contract language to help improve transparency about AI that is embedded in vendor systems.

Resource Corner

[Layer 6: AI at TD](#)

[TD Stories: TD Announces Launch of TD AI Prism](#)

[TD Stories: 10 Ways AI is Helping Shape the Future of Banking at TD](#)

[TD Stories: Inside the Team Ensuring Artificial Intelligence at TD is Trustworthy](#)

[TD Stories: 5 Organizations TD is Working With to Advance AI Innovation](#)



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TD Social Approach



TD Social Approach

Systemic risks, such as inequality and a lack of financial access, can destabilize economies, affecting TD’s performance and the communities it serves.¹⁹ When segments of society fall behind financially, their economic participation is diminished. By prioritizing financial and economic inclusion and developing solutions that help to address disparities, we can help mitigate these risks and create opportunities for our clients, communities and colleagues. In 2025, we advanced initiatives aimed at supporting financial and economic inclusion, which are highlighted throughout this section of the report.

TD operates in a number of communities across Canada and the U.S. In the U.S., our efforts to advance financial and economic inclusion also support our obligations under the Community Reinvestment Act (CRA). In the U.S., in 2025, TD Bank U.S. earned an “Outstanding” rating on its Community Reinvestment Act exam from the Office of the Comptroller of the Currency (OCC), for the period covering 2021 to 2023. This recognition reflects TD’s commitment to supporting access to housing, economic opportunity and community development in underserved neighbourhoods.

We recognize that there are many challenges and uncertainties related to economic inclusion; although we remain flexible in our approach, we have directed efforts across three areas: Financial Access, Housing Access and Employment Access.

	Financial Access	Housing Access	Employment Access
Program and Initiative Highlights	<ul style="list-style-type: none"> Began offering a no-monthly fee TD Minimum Chequing Account for Indigenous Peoples in Canada as part of our ongoing commitment to strengthening economic reconciliation, as well as no monthly overdraft protection fee on the same account. Achieved our target of reaching 500,000 participants through TD-led and supported financial education initiatives in Canada and the United States.¹ Opened our fifth Community Store, located in Boston, MA. These stores have a particular focus on financial wellness and education, while also providing traditional banking services. <p>See the Financial Access section for more details.</p>	<ul style="list-style-type: none"> Supported approximately 2,540 households through solutions such as mortgage refinancing, payment deferrals, amortization extensions and interest-only payments. Contributed \$8.5 billion toward our \$12 billion North American affordable housing financing target.² Provided construction financing for the Sharswood Phase III Project, a development of 224 new multi-family units in North Philadelphia, PA, and for the Poinciana Parc project in Osceola County, FL, an 86-unit affordable rental housing community for low-income seniors. <p>See the Housing Access section for more details.</p>	<ul style="list-style-type: none"> Delivered learning opportunities that touched 100,000+ colleagues. Continued the Connected Leadership Academy leadership training program, developed by McKinsey and LinkedIn and available to all U.S. colleagues. The program focuses on critical leadership skills such as resilience, problem solving and developing business strategies. Colleagues received more than two million eCards and awards distributed through TD Appreciate, our internal appreciation platform. <p>See the Employment Access section for more details.</p>

¹ Participants include clients and community members who take part in or receive information through sessions or programs in Canada and/or the U.S. that aim to improve their financial knowledge. “TD-led” initiatives include activities facilitated or delivered directly by TD. “TD-supported” initiatives include programs facilitated by or with charitable organizations that are both partially and fully funded by TD. In addition, the number of participants reported may not reflect unique participants, as participants might engage with multiple programs.

² Includes the activities outlined in the “Affordable and Community Housing” category of the Sustainable & Decarbonization Finance Target, with the exception of residential real estate purchases. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for details. This affordable housing financing metric covers key business activities of the Bank, including lending, financing, underwriting and advisory services. The metric represents the cumulative amount of new financing and refinancing activities over eight years, from November 1, 2022 to October 31, 2030. Progress toward this metric is also counted toward the Sustainable & Decarbonization Finance Target and is reported for activities in both Canada and the U.S.



Financial Access

Our Approach

To help address financial access and affordability and grow the Bank, TD provides financial education resources and advice, dedicates teams to serving clients from diverse communities, and enhances or develops products, services and processes that help remove barriers and build financial health and resilience.

Access and Affordability

We work to provide all individuals across our footprint with fair, convenient and equitable access to our products and services by offering affordable product options to clients. We open personal accounts regardless of a person’s employment status or whether they are experiencing or have experienced bankruptcy at any time, subject to conditions. We are committed to providing clients with clear, transparent information about our products and services and we strive to use plain language when communicating with clients, with the aim of making our documentation easy to read, understand and use. We evaluate customers in accordance with consistent risk management guidelines, policies, standards and procedures, and consider risk factors unique to customers and transactions.

Inclusive Products and Services

Retail Clients

Project Highlight

In 2025, TD Bank U.S. introduced enhancements to its credit card underwriting, which now leverages TD deposit cash flow information and advanced machine learning models when evaluating credit decisions. This has increased eligibility among deposit clients, expanding access to credit to underserved communities, with a significant increase in the eligible population for new-to-credit clients who are traditionally underserved by traditional bureau-based underwriting. This has contributed to an increase in approval rates on credit card applications that meet necessary criteria, helping to make credit more accessible.

Affordability

In Canada, select affordable product options include the TD Minimum Chequing Account, which offers a low-fee basic banking option to all clients, a no-monthly fee TD Minimum Chequing Account for Indigenous Peoples that supports our ongoing commitment to strengthening economic reconciliation, and a no-monthly fee TD Minimum Chequing Account for seniors receiving the Guaranteed Income Supplement or beneficiaries of the Registered Disability Savings Plan.

In the U.S., TD Bank U.S. offers account options to clients across its footprint that are built for every stage of life, such as TD Essential Banking, a low-cost, no-overdraft-fee deposit account designed to meet the needs of more clients in more communities. With TD Essential Banking, clients are able to bank with no minimum daily balance requirements. TD Bank U.S. also offers TD Complete Checking, with three ways to waive the monthly maintenance fee, and TD Beyond Checking, with additional perks and ways to waive the monthly maintenance fee. Through its product offerings, work with community organizations, client conversations and TD Bank U.S.’ suite of financial education tools, TD Bank U.S. is committed to helping empower its clients to make decisions that bring personal goals within reach by sharing resources both in person and online.

Indigenous Peoples

As part of our ongoing commitment to fostering financial inclusion and strengthening economic reconciliation, we offer a wide range of products and services to Indigenous communities through our Canadian branch locations, which include four branches on-reserve. We also provide telephone banking services in Cree and Inuktitut languages.

To help increase access to financial services for clients from Indigenous communities, TD continued to deliver off-site (remote) account opening services in rural areas. In addition, TD hosted community events, small-group interactions and financial literacy sessions to support the financial needs of Indigenous communities. Starting in November 2025, TD began offering a no-monthly fee TD Minimum Chequing Account for Indigenous Peoples from Canada, as well as no monthly overdraft protection fee on the same account.

We acknowledge that there is still more work to be done toward reconciliation, and we are committed to doing our part. In support of our commitment to advancing Truth and Reconciliation, fostering inclusivity for clients, colleagues and communities, and upholding Call to Action #92 to the corporate sector, TD launched its Truth and Reconciliation Statement in January 2025, which is displayed on digital screens in branches across Canada. Also in 2025, TD published the [TD and Indigenous Communities in Canada – 2025 Update](#), an update on how it supports Indigenous communities through its business and philanthropy.

Resource Corner

[Financial Access Data](#)

[TD Advice](#)

[Financial Security](#)

Small Business Resources: [United States](#) and [Canada](#)

[Just Arrived in Canada](#)

[Diverse Business Credit Resources](#)

[Women in Business Website](#)

[TD Wealth for Women Website](#)

[TD and Indigenous Communities in Canada – 2025 Update](#)

[Black Client Experience](#)

[Black Entrepreneurs](#)

[2SLGBTQ+ Entrepreneurs](#)

[Accessibility at TD](#)



Financial Access continued

Seniors

For seniors (60 years of age or older), we offer a monthly fee discount on the TD Every Day Chequing Account, TD Unlimited Chequing Account and TD All-Inclusive Banking Plan. We also offer a no-monthly fee TD Minimum Chequing Account for seniors receiving the Guaranteed Income Supplement or beneficiaries of the Registered Disability Savings Plan. For information about how we work to support the unique financial needs of our senior clients, see our [Public Accountability Statement](#), and for information about the accessible features of our branches and ATMs, see our [Accessibility Progress Report](#).

Newcomers to Canada

At TD, we want to help newcomers feel confident about banking in Canada. Starting life in a new country is exciting but comes with pressure, especially when it comes to finances. A [2025 TD survey](#) polled both newcomers and the general Canadian population to better understand their financial experiences, needs and challenges. Of those polled, 55% of newcomers said that managing their finances in Canada has been

difficult, mainly due to a lack of familiarity with Canada's financial system. According to the survey, this issue affects newcomers of all age groups, income levels and countries of origin, even those who report having a solid background in financial literacy.

A [second 2025 survey](#), focused on access to credit, showed that 79% of newcomers find it challenging to build a credit history, with nearly 60% reporting that better access to credit would improve their overall living experience. While most apply for credit, 82% report facing barriers such as lower credit limits or navigating an unfamiliar system. These challenges often translate to financial stress, limited borrowing power and difficulties securing housing.

The insights from these surveys underscore the importance of building a more inclusive financial system – one that reduces barriers and expands opportunities for newcomers to thrive – in order to help individuals establish stability, and to contribute to the long-term strength and reliance of the economy and communities across Canada.

Helping Reduce Language Barriers and Inclusive Products and Services

We offer products and services tailored to newcomers, as well as relevant financial education materials. In branches across Canada, TD personal banking colleagues assist their communities in more than 50 languages, telephone support colleagues assist clients in more than 200 languages, and our ATMs offer seven languages: English, French, Punjabi, Portuguese, Italian, and Simplified and Traditional Chinese. We offer materials in more than 10 languages across our in-person and digital channels to help newcomers transition to banking in Canada, and to support them in finding products that help meet their needs. For example, our new “New to Canada Learning Center” hub offers information introducing the Canadian banking system, with detailed advice on budgeting, building credit, investing and home ownership.

Along with striving to build financial literacy and confidence, we offer products and services to help meet the specific banking needs of newcomers to Canada, such as the [TD New to Canada Banking](#)

[Package](#), the [TD International Student Banking Package](#) and the [New to Canada Welcome Booklet](#).

TD also continues to build strategic partnerships to support newcomers. For example, through our relationship with CanadaVisa, a Canadian immigration information platform, TD provides newcomers with advice and education about financial topics such as how to build good credit, what to know before buying a home and tips for first-time investors in multiple formats across a variety of channels.

Partnering on Employment Support for Newcomers

TD also participates in professional development opportunities for those new to Canada. For example, TD is a founding partner of the TRIEC Mentoring Partnership Program, which pairs newcomers to Canada who are professionals in their fields with TD colleague mentors to help them gain insight into job searching, networking and finding employment in their field of expertise. TD is the first TRIEC partner to surpass 3,000 mentorship matches.

iD8 and Patent Filings

The iD8 program helps TD drive a culture of innovation and produce solutions that help us to be a simpler and faster Bank. We review 100% of the ideas submitted through iD8 and have received more than 112,400 ideas since the program began in 2019. More than 12,200 of these submitted ideas have now been implemented.

In 2025, based on an idea submitted via iD8, we enhanced the Mini App process for credit cards that enhanced the experience of New to Canada clients applying for credit cards. Previously, New to Canada clients with no credit history were required to complete a mini-application prior to proceeding to the full application, even though the mini-application would frequently be declined. This resulted in poor client experience and added time to the process. In response, we launched new credit card adjudication logic that auto-approves more

eligible, temporary workers, and international student clients, along with bypassing the need for two applications. This is expected to positively impact approximately 90,000 TD clients, while streamlining the process for colleagues.

TD's patent program reflects our commitment to technical innovation to help adapt the Bank and improve the lives of our clients and colleagues. In 2025, we filed a patent for a system that uses sensor data to automatically activate personalized features across TD's digital applications and offerings, helping improve usability for both clients and colleagues. Today, more than 1,000 colleagues continue to pursue technical innovation to grow TD's patent base, which totals over 3,000 patent assets globally, of which 30% are AI innovations.



Financial Access continued

Business Clients

In Canada and the U.S., TD helps small businesses grow in two primary ways: by providing financial solutions to help meet their needs, and through the relationships we build with the clients and communities we serve. We offer tools and resources specific to small businesses, available through the [TD Small Business Resource Center](#) in the United States and the [Small Business Tools and Resources](#) site in Canada. Additional information about TD’s support for small business can be found in our [Public Accountability Statement](#).

Our U.S. and Canadian small business targets build on the Bank’s ongoing commitment to support the role small businesses play in local and national economies. Small business lending has long been a key business activity for the Bank. Setting targets in this area helps us track existing activities and drive future work in this space.

Target	2025 Result	2024 Result
US\$2.8 billion in small business loans ¹ to businesses with gross annual revenue ≤US\$1 million and/or small businesses located in low- and moderate-income ² geographies in the U.S. from 2024 to 2026 (cumulative from 2024) ^{3,4}	\$1.8 billion	\$0.9 billion
\$12 billion in loans and other credit facilities through TD Small Business Banking from 2023 to 2030 (cumulative from 2023) ⁵	\$5.7 billion	\$3.8 billion

¹ Small business loans are defined consistent with the Community Reinvestment Act (CRA) regulations in effect at the time of loan origination.

² As defined in CRA regulations, low-income community means there is a median family income of less than 50% of the area median income. A moderate-income community means that the median family income is at least 50% and less than 80% of the area median income.

³ This target represents the cumulative amount of new financing and refinancing activities over three years, from January 1, 2024 to December 31, 2026. Results are reported based on calendar year. A portion of this target is also eligible for the \$500 billion Sustainable & Decarbonization Finance Target. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for details on the activities eligible for inclusion toward that Target.

⁴ This target is part of our US\$20 billion Community Impact Plan.

⁵ Includes loans and other credit facilities (all Small Business Banking credit products such as loans, business line of credit, business overdraft protection and loans with government or Crown Corporation guarantees) to businesses where the credit amount is approximately \$1.5 million or less. The target represents the cumulative amount of new financing and refinancing activities over eight years, from November 1, 2022 to October 31, 2030. Progress toward this target does not contribute to the Sustainable & Decarbonization Finance Target, and there are differences in inclusion criteria and associated measurement between this target and the Sustainable & Decarbonization Finance Target.

Below we highlight some of the ways we are working to support clients and small businesses with our product and service offerings and through the relationships we build with the clients and communities we serve.

Canada

- In 2025, TD continued to offer the Business Accelerator Loan Program, a financing option supported by a guarantee from Business Development Bank of Canada (BDC) that helps TD provide access to financing for eligible small- and medium-sized enterprises across Canada. In addition, TD launched TD eCommerce Solutions in 2024, a highly customizable eCommerce platform for Canadian small businesses to sell their products and services online and accept payments.
- We provide tailored financial advice, services and support for entrepreneurs from Indigenous communities through their journey from starting a business to expanding into new markets. Through programs like the Business Accelerator Loan Program and the expansion of TD’s team of remote Business Banking Specialists who are available to serve the needs of clients, including those located in remote communities, TD supports entrepreneurs from Indigenous communities.
- TD continues to offer the Black Entrepreneur Credit Access Program (BECAP), launched in 2023. BECAP provides self-identified Black entrepreneurs with resources and support through specialized small business account managers and a team of Business Development Managers across Canada who provide financial advice and support while also providing Small Business Banking credit offerings. This program aims to provide more equitable access to credit for Black entrepreneurs in Canada, who may disproportionately face hurdles securing funding for their businesses, helping to foster economic inclusion. We offer support for applicants, including those who do not qualify for funding or are declined, by connecting them to an ecosystem of support. Clients who do not qualify are encouraged to work with our specialized Account and Small Business Managers to obtain additional resources.

United States

- TD Bank U.S. supported small businesses in 2025 by hosting events on solutions for small businesses, presented by TD Bank U.S. Community Business Development Officers. These events offer education and information relevant to small businesses and can also open the door to meaningful conversations between TD Bank U.S. and existing and potential clients. Through these discussions, Community Business Development Officers can show small businesses how TD Bank U.S. can help support their evolving needs. See this [TD Stories](#) article about how TD Bank U.S. supported one small business to bring its business to TD following one of these events.



Financial Access continued

Financial Health

In Canada and the U.S., we offer financial education tools and resources to help clients feel confident in their financial decisions.

In 2025, we achieved our target of reaching 500,000 participants through TD-led and supported financial education initiatives in Canada and the United States.²⁰ This target reflects and drives our efforts to provide dedicated financial education sessions, tools and programs to our clients and communities. We also support our colleagues' financial well-being by providing tools and resources to help them manage commitments, meet goals, protect against risks and cope with financial shocks.

Target	2025 Result	2024 Result
Reach 500,000 participants through TD-led and supported financial education initiatives in Canada and the U.S. in 2025 ¹	869,351	502,389 ²

¹ Participants include clients and community members who take part in or receive information through sessions or programs in Canada and/or the U.S. that aim to improve their financial knowledge. "TD-led" initiatives include activities facilitated or delivered directly by TD. "TD-supported" initiatives include programs facilitated by or with charitable organizations that are both partially and fully funded by TD. In addition, the number of participants reported may not reflect unique participants, as participants might engage with multiple programs.

² The target in fiscal year 2024 was 500,000.

Beyond this target, we remain committed to providing clients with high-quality service and trusted advice, often including providing information to help clients build their financial knowledge.

What We Did in 2025

Canada

- TransUnion CreditView Dashboard is available in the Canadian mobile app to monitor personal credit history. Available at no additional cost, the experience enables clients to check and report possible inaccuracies in their credit score, see trending history and simulate how variables could impact their creditworthiness.
- TD Bank U.S. continued to offer financial education for families and small businesses in 2025 and added new curriculum to the TD Security Awareness for Everyone (SAFE) library, which is now available in Canada. TD Bank U.S. launched TD SAFE for seniors, which provides information about how to protect senior citizens from fraud and scams. Delivered alongside local law enforcement and community partners, TD SAFE aims to help community members, particularly vulnerable populations such as senior citizens and students.

- TD provides tips and tools related to budgeting, borrowing, investing and everyday banking via our [website](#), which also offers educational articles about financial topics such as inflation and interest rates, and planning for life events like homeownership, getting married and travelling.
- The TD Financial Health Assessment Tool provides users with a general assessment of their financial health and subsequently provides related tips and information. TD also offers the [TD Discovery Tool](#), which provides users with product recommendations after answering questions about their needs, circumstances and goals.

United States

- TD Bank U.S. continued to offer financial education for seniors, families and small business partners in 2025, and added new curriculum to the TD SAFE library to include commercial businesses. TD Bank U.S. created TD SAFE for commercial, which provides information about how to protect their businesses from fraud and scams. Delivered alongside local law enforcement, chambers of commerce and community partners, TD SAFE aims to help community members, particularly vulnerable populations such as senior citizens and students.
- TD Bank U.S. store and phone channel colleagues are equipped with a robust suite of financial education messages designed to support clients' financial education. Upon client request, these messages are delivered via SMS text, providing timely access to valuable financial tools and resources that help clients to make informed financial decisions.
- In 2025, TD Bank U.S. delivered comprehensive educational messaging and access to financial education resources that provided guidance on mortgages, the home buying process and strategies for building savings. TD Bank U.S. continued to support clients with educational resources about establishing or improving credit, understanding and reducing fees, and implementing measures to safeguard against identity theft.
- TD Bank U.S.' Community Stores provide support with dedicated spaces tailored to deeply engage with communities, in particular focusing on their financial wellness and education, while providing advice, guidance, and access to traditional banking services. These stores engage with local organizations, including educational non-profits and organizations that support community revitalization and small businesses. Colleagues who work in Community Stores receive training focused on community outreach, financial education and understanding TD Bank U.S. products and services. In 2025, working closely with local non-profits, TD Bank U.S. opened its newest Community Store in the Nubian Square neighbourhood of Boston, MA, adding to existing locations in Jacksonville, FL, Philadelphia, PA, Washington, DC and Charlotte, NC.



Housing Access

Our Approach

Through housing access, we aim to grow the Bank by focusing on providing tools and advice to help people access and remain in homes that meet their needs, contributing to the supply and refurbishment of affordable housing through our financing, and supporting organizations that increase access to secure affordable housing and related supports.

In 2025, TD contributed approximately \$27.6 million in grant funding to 335 organizations across its North American footprint that aim to support access to housing. In Canada, funding was awarded to non-profit organizations across the country, including the Restoration and Empowerment for Social Transition Centre's Bridge to Hope initiative, which aims to help youth who are experiencing or are at risk of homelessness obtain stable housing and financial independence.

approximately 5,370 proactive calls to clients at risk of mortgage default. Through this program, households reported greater confidence in their financial situation after reviewing their residential banking products with a TD advisor.

- TD continued to support housing access with programs aimed at helping to keep existing homeowners in their homes through financial literacy. Our quarterly newsletter provided mortgage holders with advice on current market events, mortgage management, and ways to save money by leveraging home equity. As rates decreased, we communicated with negatively amortizing customers to inform them of their options until the population reached zero.

Resource Corner

[Housing Access Data](#)

[Housing for Everyone Competition](#)



Retail

Tools and Advice

Canada

- TD Helps assists clients in Canada facing financial hardship. In 2025, the program supported approximately 2,540 households through solutions such as mortgage refinancing, payment deferrals, amortization extensions and interest-only payments. We also made



Housing Access continued

Retail Lending

Canada

- TD continued to onboard communities to its First Nation Home Loan Program in 2025. Introduced in 2021, this loan program provides financing to First Nations members to purchase, renovate or construct single-family homes on First Nations lands and settled lands. Working collaboratively with Business Bankers, Retail, Wealth, Wholesale businesses and Indigenous communities, the Indigenous Banking Group uses a comprehensive approach to provide support and financial advice and to help meet the unique needs of Indigenous Peoples, businesses, organizations and communities through long-term financing, our philanthropy and information sharing.

United States

- TD Bank U.S. continued to serve the lending and homebuyer education needs of minority borrowers through TD Bank U.S. community mortgage loan officers in the U.S. We aim to support equal access to home financing by targeting US\$10 billion in home lending to LMI and/or minority borrowers and geographies in the U.S. from 2024 to 2026, and in 2025, we contributed \$3.95 billion towards our target.

- Real Estate Secured Lending (RESL) offers residential loan products designed to be flexible to support the needs of first-time homebuyers, LMI individuals, and minority communities. Its affordable mortgage suite includes both TD Bank U.S. proprietary and government-sponsored products. Examples include TD Right Step Mortgage®, TD Home Access Mortgage®, Fannie Mae HomeReady Mortgage, and Federal Housing Administration and Veterans Administration mortgages.
- TD recognizes that purchasing a home is just the first step in the homeownership process. Maintaining the home requires planning and expenditures. TD Bank U.S. designed TD Home Access Mortgage®, a special purpose credit program offered in several majority-minority neighbourhoods across its footprint to increase homeownership opportunities in our communities. The product provides eligible borrowers a US\$10,000 lender credit that does not require repayment, which can be used toward closing costs on a home purchase. TD Bank U.S. also offers TD Right Step Mortgage®, which provides flexible financing options for LMI borrowers. Both of these proprietary products complement TD Bank U.S.’ suite of affordable mortgage products, intended to support more clients and communities across its footprint. As part of our ongoing home lending strategy to support access to housing in our communities, TD Bank U.S. also continues to purchase Community Reinvestment Act-eligible mortgages from non-banks and other lenders across our footprint each year, providing substantial liquidity in support of LMI lending.

Target	2025 Result	2024 Result
US\$10 billion in home lending to low- and moderate-income and/or minority ¹ borrowers and geographies in the U.S. from 2024 to 2026 (cumulative from 2024) ^{2,3}	\$8.1 billion	\$4.2 billion

¹ The term “minority” for the purpose of this target, means Black or African America, Hispanic, Asian, American Indian or Alaska Native, Native Hawaiian or Other Pacific Islander.

² TD Bank U.S.’ ability to achieve lending and investment targets within the Community Impact Plan are subject to changes in economic conditions, regulatory requirements, and TD Bank U.S.’ obligation to maintain safe and sound banking practices. Market conditions, including but not limited to sustained inflation, elevated interest rates, and economic recession, may negatively impact TD Bank U.S.’ ability to meet its targets.

³ Includes, within the TD Bank N.A.’s facility-based assessment areas, TD-originated residential mortgage loans to minority borrowers, borrowers residing in majority-minority census tracts, LMI borrowers, and borrowers residing in LMI census tracts, and TD-purchased residential mortgage loans to LMI borrowers and borrowers residing in LMI census tracts. The target represents the cumulative amount of TD-originated mortgage loans and TD-purchased residential mortgage loans over three years, from January 1, 2024 to December 31, 2026. Results are reported based on calendar year. A portion of the target is eligible for the Sustainable & Decarbonization Finance Target. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for details on the activities eligible for inclusion toward that Target.



Housing Access continued

Non-Retail: Affordable Housing Financing

In Canada, TD's National Real Estate Group (NREG), together with TD Securities, the Commercial Mortgage Group (CMG), Commercial Banking and the Indigenous Banking Group, have a mandate to take a targeted approach to supporting housing access.

In the United States, TD Bank U.S. aims to make loans and investments that support access to housing for LMI families and neighbourhoods through collaboration across the business lines of Real Estate Secured Lending (RESL), Community Development, Commercial Banking and the Community Capital Group (CCG).

To help advance housing access, we set a target in 2023 to provide \$12 billion in affordable housing financing from 2023 to 2030 to assist in improving the supply and refurbishment of affordable housing in Canada and the U.S. In 2025, we contributed \$2.6 billion towards this target:

Target	2025 Result	2024 Result
\$12 billion in affordable housing financing in Canada and the U.S. from 2023 to 2030 (cumulative from 2023) ¹	\$8.5 billion	\$5.9 billion

¹ Includes the activities outlined in the "Affordable and Community Housing" category of the Sustainable & Decarbonization Finance Target, with the exception of residential real estate purchases. See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for details. This \$12 billion affordable housing financing target covers key business activities of the Bank, including lending, financing, underwriting and advisory services. The target represents the cumulative amount of new financing and refinancing activities over eight years, from November 1, 2022 to October 31, 2030. Progress toward this target is also counted toward the Sustainable & Decarbonization Finance Target and is reported for activities in both Canada and the U.S.

Commercial and Corporate Lending

Canada

- CMG works with borrowers in Commercial Banking and Corporate Banking, TD stakeholders and brokers to provide ongoing long-term financing, including for affordable housing projects.
- NREG finances larger construction projects, which may include an affordable housing component (e.g., projects in which a small number of units are presold to government entities). NREG participates in the Canada Mortgage and Housing Corporation (CMHC) mortgage loan insurance (MLI) Select program (and, before that, CMHC's MLI Flex program).

United States

- The Commercial Banking team has deep relationships with local, regional and national non-profit Community Development Financial Institutions (CDFIs) with the goal of expanding access to capital for a wide number of projects. Recently, the Greater Washington team extended an additional US\$5 million in term debt capital to Partners for the Common Good, a national non-profit CDFI focused on economic empowerment in underserved communities. These funds will be deployed across TD Bank U.S.' U.S. footprint on projects that provide a range of communities with affordable housing development and construction, commercial real estate, and educational and community facilities.
- TD Bank U.S. financed a US\$16.8 million loan for the 340+ Dixwell Apartments in New Haven, CT, a mixed-rate community that will have 55 affordable units and 14 market-rate units.²¹ The building uses mass timber, which is an engineered wood used for more efficient construction, and which helps to reduce carbon emissions and improve air quality.²²

Capital Markets

- In Canada, TD Securities works with public issuers, real estate arms of pension funds, and private equity firms to assess equity and debt capital solutions to support affordable housing strategies, and participates in social housing programs, as well as the CMHC MLI Select program by funding pooled loans.



Housing Access continued

Tax Credit Investments

- CCG makes equity, loan fund and tax credit investments that support access to housing, including Low-Income Housing Tax Credits that support large-scale affordable housing projects.
- TD Bank U.S. provided US\$60.8 million in construction financing via a direct purchase bond through Pennsylvania Housing Finance Agency, and TD Community Capital Group invested US\$33 million in Low-Income Housing Tax Credits (LIHTC) for Sharswood Phase III. Built in the Sharswood neighbourhood of North Philadelphia, PA, the development has 224 new multi-family units: 189 units for LMI households and 35 market-rate units.²³ The community will offer access to a nearby grocery store, urgent care and public transportation. The development was selected for an Implementation Grant through HUD's Choice Neighborhoods Initiative to help preserve affordability in an area facing rapid gentrification.
- TD Bank U.S. provided US\$18 million in construction financing to Green Mills Group for Poinciana Parc in Osceola County, FL, an 86-unit affordable rental housing community for low-income seniors that is adjacent to the Poinciana SunRail Station. TD Community Capital Group also provided a US\$19 million equity investment with LIHTC.

New Markets Tax Credit Investments

- The TD Community Development Corporation committed a US\$5.5 million New Markets Tax Credit (NMTC) investment through its Thriving Communities Fund, managed by Broadstreet Impact Services, and a US\$2.3 million Historic Tax Credit investment to help support associated construction and rehabilitation costs of the Chocolate Factory project. This project involves the reuse and renovation of the 1920s Blumenthal Brothers Factory in Philadelphia, PA to create vibrant community space for local businesses – including El Concilio, one of the city's major umbrella agencies for services to low-income families – and includes a childcare provider. The project is creating 130 jobs, while attracting new investment and expanding family services to a high-poverty neighbourhood.
- GreenSource Fabrication is expanding its presence in Charlestown, NH with a US\$17.4 million NMTC equity investment from TD Bank U.S. and a US\$8 million NMTC allocation from the TD Community Development Corporation. GreenSource is building a 98,000-square-foot manufacturing facility to produce ultra high-density interconnect printed circuit boards²⁴ that are used in communications and radar systems, satellites and more. The company uses a proprietary Zero Liquid Discharge process that makes its manufacturing more environmentally friendly by limiting hazardous wastewater. With this development, GreenSource will create 50 to 100 full-time jobs, the majority of which will require no more than a high school diploma, as well as retain 140 high-quality jobs.



Employment Access

Our Approach

Our goal is to attract, retain and develop the best talent, offer an inclusive workplace where everyone can thrive, and enable colleagues to achieve their full potential and long-term success. These efforts support our continued competitiveness and performance as we work to create long-term shareholder value.

Our TD culture shapes who we are as a Bank and how we show up for our clients, colleagues and communities. It's reflected in our choices and decisions and how we make them. Our colleagues bring our culture to life and shape our culture every day.

Developing Our Colleagues

One of our priorities at TD is to win together – we aim to foster teamwork and treat each other with respect and kindness in order to create an inclusive workplace where great talent thrives. Our leaders are guided by common principles, including being courageous to inspire our teams to stretch, grow and deliver exceptional outcomes, embracing different perspectives, backgrounds and experience, and focusing on growing and supporting our talent through development conversations.

Upskilling the TD Workforce

Our development programs are anchored in the skills and capabilities needed to grow and thrive at TD. We continue to develop programs and

platforms that help upskill our workforce and assist colleagues as they transition into new roles and as the banking industry evolves. Colleagues across the Bank engage in learning through multiple platforms in order to build the skills and capabilities they need to be effective in their current roles, prepare for future roles and excel at new ways of working. In 2025:

- The Learning and Development team oversaw over 600 learning programs reaching more than 100,000 colleagues annually, including new-hire training, cross-skilling, mandatory learning, leadership development and business-required training. More than half of TD's colleagues participated in instructor-led training this fiscal year.
- TD's internal learning platforms offer approximately 246,000 learning assets that are available to all colleagues. TD Thrive, for example, is a key component of our learning strategy and was accessed by approximately 87.9% of TD colleagues.

Building and Developing Our Leaders

Aligned with the leadership skills valued at TD, our leadership programs are designed to build leadership capability among colleagues, foster cultural alignment across the enterprise, and accelerate performance at all levels. Highlights of our leadership programs include:

- Our Talent Review Program, refreshed in 2024, focuses on the development of senior talent, as well as succession planning for senior roles within the organization.

- The Path to Leadership program, relaunched in 2025 as TD's flagship onboarding experience for all new people managers, provides unique learning paths for leaders transitioning from an individual contributor role to a people manager role or for experienced managers joining TD.
- The Executive Signature Program, co-led by senior TD leaders and external faculty, and available to all Vice Presidents (VPs) and Associate Vice Presidents (AVPs), focuses on executional excellence, leadership accountability, building high-performing teams and strategic clarity.

Building Diverse and Empowered High-Performing Teams

TD strives to have the best talent to serve our clients and communities. Our talent development and recruitment activities support our ability to build a highly engaged and competitive workforce from across the communities where we live and work.

To build an empowered, high-performing organization, leaders at the Bank are expected to foster an inclusive organization, where all colleagues belong, are supported, are rewarded for strong performance and have the full opportunity to thrive and contribute to TD's success. We know that a diverse workforce with a range of experience, backgrounds and abilities allows us to better serve our clients and communities and makes our business stronger.

Colleague Retention and Redeployment

To engage and retain our talent, we focus on developing our colleagues and providing them with support and opportunities to grow their careers. We introduced new career development resources for all colleagues and added them to Career Solutions, an internal website that offers tools and resources to support colleagues with their growth and development. This includes a Career Solutions Guide for People Managers, available to all colleagues, to support leaders in career development conversations with their teams. We also created a three- and four-part series called "Career Meeting-in-a-Box" to allow colleagues to tailor career conversations that fit their development needs. For information about redeployment efforts, see [TD's Approach to Job Transitions](#).



Employment Access continued

Supporting and Engaging Our Colleagues

Colleague Engagement

We take a comprehensive approach to understanding our colleagues' experiences. We measure key dimensions including engagement, inclusion, well-being, leadership effectiveness, work enablement (i.e., providing the tools and resources colleagues need to do their jobs) and culture through our annual Pulse survey and ongoing feedback channels; for example, surveys sent to a sample population of colleagues at different points in the year. Survey results consistently show that TD colleagues experience a strong sense of belonging and thrive in a supportive workplace where their voice is heard.

Rewards and Recognition

TD's greatest strength is our people, and we engage colleagues through enterprise-wide and business-specific recognition programs and initiatives for individuals and teams. In 2025, colleagues received more than two million eCards and awards distributed through TD Appreciate, our

internal appreciation platform. We celebrated approximately 12,000 colleagues through the TD Celebrates Careers program, recognizing work anniversaries with a choice of TD shares or a gift, and we recognized approximately 4,500 colleagues at various business-specific annual recognition events. For information about how we reward and recognize our colleagues, see [TD's Approach to Fair Pay](#).

Colleague Health and Well-being

We believe in a holistic approach to healthy, active and balanced living and providing opportunities for colleagues to assess, manage and improve their well-being. We foster a culture of care through comprehensive benefit plans and a workplace that is responsive to the needs of our colleagues. Our Well-being Ambassador Program, for example, is a network of trusted representatives within our businesses across our footprint, where ambassadors provide colleagues with tips, tools and resources to support their well-being. Every

other month, the program spotlights a well-being topic and related resources focused on one of our four pillars of well-being: physically thriving, mentally flourishing, socially connected and financially secure. Our [North American Health and Safety Policy](#) establishes the framework TD employs to provide a healthy and safe workplace and environment for colleagues.

We introduced new internal social media channels to create additional avenues for colleagues to connect, share and learn from each other about their well-being. These communication channels created informal avenues for leaders and team members to share personal stories to help create safe, open spaces for conversations about well-being.

Resource Corner

[Employment Access Data](#)

[Code of Conduct and Ethics](#)

[Responsible Sourcing](#)

[TD's Approach to Fair Pay](#)

[TD and Indigenous Communities in Canada – 2025 Update](#)

[Summary of Benefit Programs](#)

[TD's Approach to Job Transitions](#)

[Developing Leaders](#)

Target	2025 Result	2026 Target
Provide a great place to work – Overall Employee Engagement (85% for 2025) ^{1,2}	84%	85%
Provide an inclusive place to work (84% for 2025) ²	86%	84%

¹ This represents Overall Employee Engagement as measured using the TD Pulse Survey, which asks full-time and part-time employees (excluding contractors and individuals on short-term or long-term leave) to rate their level of commitment and connection to TD and their role along three dimensions (intention to stay, pride in working at TD and job satisfaction) on a scale of one to five: Strongly Disagree (1), Disagree (2), Neither Agree Nor Disagree (3), Agree (4) and Strongly Agree (5). The percentages represent the average proportion of overall respondents who either agreed (4) or strongly agreed (5) with the first three statements shown in the Pulse Survey Results table (found in the "Employment Access" section of the [2025 Sustainability Performance Data Pack & Indices](#)).

² Target is based on achieving results that are within the 75th percentile of a global benchmark (a three-year rolling benchmark), which is updated annually and consists of over 900 companies and 27 million responses, spanning geographies and industries.

Employment Access continued

Physical Well-being: After the success of our Women’s Health Hub launched in 2024, we launched the Men’s Health Hub in November 2025, for topics like mental health, cancer awareness and heart health, and it includes stories from leaders about their own health journeys. We also highlighted the benefits of strength training for all ages and hosted a global virtual class to help all colleagues add movement to their day. In the U.S., we hosted our annual Move More Challenge on the TD Well-being App (powered by Personify Health), a way for colleagues to get moving, have fun and win prizes. This year’s challenge had the highest participation to date; colleagues formed 670 teams and collectively walked more than 500 million steps.

Financial Well-being: We introduced the Financial Health Hub in Canada, with tools and tips to help colleagues manage their money. Our Well-being Ambassadors played a key role, sharing advice on building positive cash flow and promoting our Cash Buffers campaign, which included a tip sheet on saving for life’s surprises. In the United Kingdom and Ireland, we hosted webinars with our pension providers Scottish Widows and Irish Life, highlighting the benefits of joining the pension plan and how TD supports retirement planning for our colleagues. For information about how we reward and recognize our colleagues, see [TD’s Approach to Fair Pay](#).



Mental Well-being: During Mental Health Awareness Month, we ran a global campaign called “Showing Up for Mental Health.” It featured webinars, activities and stories from colleagues about how they support their own and one another’s mental health. We also expanded our Employee & Family Assistance Programs in Canada and the U.S. to include enhanced mental health support, offering 24/7 guidance and a better user experience. More information about these programs can be found in [TD’s Approach to Mental Health in the Workplace](#). In June, our Singapore office hosted a well-being seminar promoting our colleague benefits facilitated by Willis Towers Watson.

Social Well-being: We explored digital well-being with our colleagues, including how to use technology in ways that support one’s well-being. Ambassadors encouraged teams to track their tech habits and reflect on whether their devices were helping or hindering their health.

Employee Relations

As part of our support for their well-being, colleagues can safely raise their concerns directly with TD. We focus on strengthening the employer-employee relationship and improving colleague engagement, satisfaction and retention. The Employee Complaint Resolution Process provides colleagues with various channels to report their concerns, including an anonymous option. This facilitates the reporting of concerns to the right point of contact so that they are addressed without delay, objectively and without fear of retaliation. TD is committed to protecting individuals from reprisal in any form. Our HR Advice and

Employee Relations group maintains work standards, policies and practices consistent with TD’s commitment to the employee experience and the Bank’s business objectives.

Engaging Colleagues in Communities

Our colleagues are enthusiastic about making a positive impact in their communities. In 2025, more than 8,200 colleagues in our TD Ready Commitment Network (our internal community engagement platform) logged approximately 204,000 hours of volunteer time²⁵ to help their communities. We launched a self-paced online Non-Profit Board Leadership Program in 2023, designed by Volunteer Ottawa, for colleagues across the Bank to learn about volunteer board service as a way to support non-profits in their communities. For more information about the impact our colleagues are having in their communities, see the [Community](#) section of our TD Stories site.

Additional examples of the difference our colleagues are making through their roles at TD are featured throughout this report. See the sections on:

- [Responsible Artificial Intelligence and the TD Sustainability Strategy](#) for information on how colleagues in technology and innovation are protecting the Bank, while also positively impacting the client experience.
- [Sustainable Finance](#) and [TD Environmental Approach](#) for details about how colleagues across the enterprise are supporting clients succeed and be resilient in the long term.
- [Financial Access](#) for information about how TD teams provide expertise and tailored advice for our communities.



TD Climate Action Plan Overview	45 >
Protect	48 >
Adapt	63 >
Grow	88 >

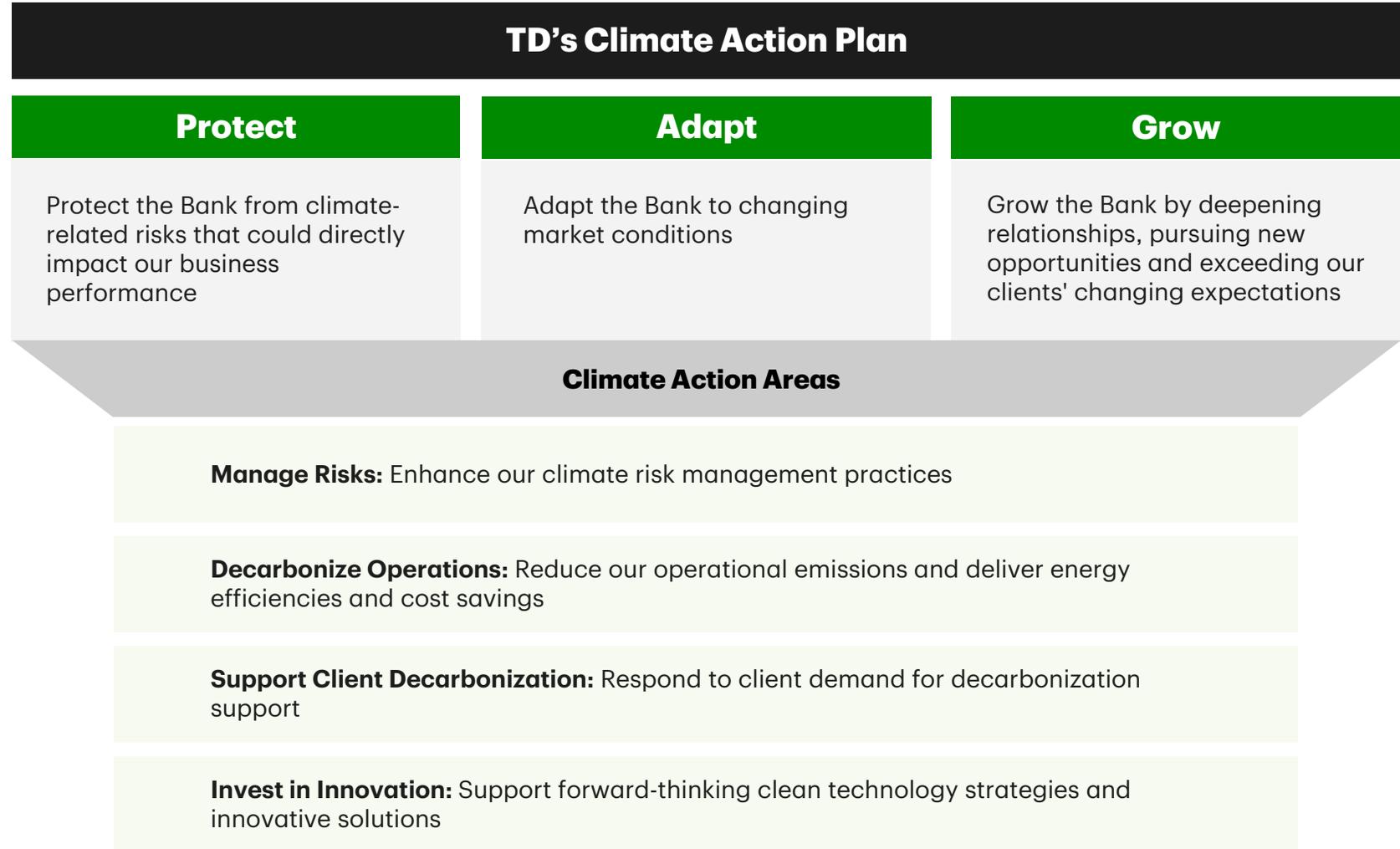
TD Environmental Approach



TD Climate Action Plan Overview

At TD, we recognize that we succeed when our clients, colleagues and communities succeed. Our Climate Action Plan continues to evolve and helps position the Bank and our clients to succeed and be resilient in the long term.

Our plan remains adaptable to ensure we focus on areas where we can achieve tangible outcomes and create value for our shareholders, considering our unique business context and priorities, and changes in the external environment.





TD Climate Action Plan Overview continued

Our Progress in Recent Years

2020

- Launched TD’s Climate Action Plan and our 2050 net-zero goal.
- Initiated E&S Target Operating Model to build capabilities to meet our net-zero GHG emissions goal.

2021

- Set interim target to achieve a 25% reduction in Scope 1 and 2 operational GHG emissions by 2025 (relative to a 2019 baseline).

2022

- Announced our first interim financed emissions targets for the Energy and Power Generation sectors.

2023

- Set interim financed emissions targets for the Automotive Manufacturing and Aviation sectors.
- Built capabilities and capacity to engage with clients on climate-transition readiness, exceeding target of reaching clients responsible for 50% of our financed emissions in the Energy and Power Generation sectors.
- Expanded the scope of our climate risk heatmap, including an acute physical risk assessment for our own real estate operations.

2024

- Expanded financed emissions footprint coverage to account for 100% of financing and investment exposures within the carbon-intensive sectors disclosed by the Bank.²⁶
- Expanded client engagement on climate transition readiness, covering clients who emit over 75% of the attributed financed emissions to TD across the Energy, Power Generation and Transportation sectors.
- Launched the Enterprise Transition Program team to support enterprise-wide governance and coordination of sustainability initiatives.
- Published 2024 Sustainability Report in alignment with the reporting requirements of the Office of the Superintendent of Financial Institutions (OSFI) Guideline B-15: Climate Risk Management.

2025

- Achieved first interim target, reducing operational GHG emissions (Scope 1 and 2) by 25% by 2025 (relative to a 2019 baseline), and set our next interim target to achieve a 46.2% reduction in our operational GHG emissions (Scope 1 and 2) by 2030, compared to a revised 2019 baseline. See [Our Approach to Operational Emissions Target \(Scope 1 and 2 GHG Emissions\) Boundaries](#).
- Enhanced financed emissions footprint calculations to cover 100% of exposures for the disclosed carbon-intensive sectors.
- Launched Foundations of Climate Risk Program, which educates colleagues on impacts on the financial sector.
- Completed Canadian OSFI’s Standardized Climate Scenario Exercise (SCSE), integrating lessons from this exercise into our climate scenario analysis plans and approaches.

Our Climate Action Areas

As part of our Climate Action Plan, we have identified four strategic outcomes of our work to protect, adapt and grow the Bank.

Manage Risks

We continue to enhance our climate risk management practices.

- + See [Protect](#) for information on how we are working to manage climate risks.

Decarbonize Operations

We are progressing on our plan to reduce the GHG emissions associated with our operations.

- + See [Operational Emissions](#) for information on how we are working to decarbonize our operations, including our next interim Scope 1 and 2 target.

Support Client Decarbonization

We continue to support our client demand

- + See [Financed Emissions](#) for information on how we measure and report our clients’ GHG emissions attributed to TD, including our footprint and interim targets.
- + See [Transition Readiness](#) for information on how we measure and track our clients’ preparedness to transition to lower-carbon operations.
- + See [Client Engagement](#) for information about our client engagement approach, including how we support our clients’ sustainability- and climate-related goals.
- + See [Sustainable Finance](#) and [Products and Services](#) for information on how we support our clients’ decarbonization efforts through sustainable finance, including our product and service offerings.

Invest in Innovation

We support forward-thinking strategies and innovative solutions .

- + See [TD’s Investment in Carbon Dioxide Removal](#) for information on how we support new carbon removal technologies.
- + See [Data, Technology and Analytics](#) for information on how we are building the infrastructure to support our capabilities.



TD Climate Action Plan Overview continued

Time Horizons

We recognize that climate-related risks and opportunities can manifest differently over different time horizons, and we define short-, medium- and long-term time horizons below. We also understand that the effects of climate-related risks and opportunities may occur over longer time horizons than those generally used in our strategic planning practices.

- **2025:** Current-year achievements
- **Short-term (1-3 years):** Action-oriented – risks and opportunities TD is mitigating or seizing
- **Medium-term (3-5 years):** Action-oriented planning for risks and opportunities on the horizon and aligning with our long-term goals
- **Long-term (5+ years):** Consideration of long-term climate perspective in TD’s strategy

Below, we outline the plans and capabilities TD envisions building over the short-, medium- and long-term to progress on the three pillars of our Climate Action Plan.

Pillar	Climate Action Area	Description	2025	Short-term (1-3 years)	Medium-term (3-5 years)	Long-term (5+ years)	
Protect	Manage Risks	Scenario Analysis: Continue to develop Climate Scenario Analysis capabilities (continually develop and test our capabilities).					
		Risk Management: Continued maturity of our planning and assessment of medium- and longer-term risks.					
Adapt	Decarbonize Operations	Operational Emissions and Targets: On an ongoing basis, reduce our operational emissions, including setting targets, monitoring and reporting progress and implementing GHG emissions reduction and efficiency measures.					
	Support Client Decarbonization	Financed Emissions and Targets: On an ongoing basis, review/enhance our financed emissions approach, measurement and reporting capabilities for our footprint and targets, using financed emissions as a metric to track the decarbonization progress of our portfolio and the economy.					
		Monitoring and Reporting: Identify additional key performance indicators (KPIs) to monitor progress in supporting our clients' decarbonization efforts and ensure regular reporting and oversight by appropriate management.					
	All Climate Action Areas	Governance and Oversight: <ul style="list-style-type: none"> • Management: Maintain Transition Program governance and oversight to ensure senior management oversight and guidance on strategic climate initiatives and ambitions. • Board of Directors: Continue to elevate material and strategic sustainability strategies and initiatives to the Board of Directors. 					
	Invest in Innovation	Carbon Removal Credits: Support the development of carbon removal technologies by purchasing high-quality verified emissions reduction and/or nature-based credits and technology-based removals in the near term with the aim of creating demand.					
		Data and Analytics: Continue investing in sustainability data infrastructure, including climate, to centralize sustainability data for various analytical needs, while building out the necessary controls to align with regulatory requirements.					
All Climate Action Areas	People and Talent: Ensure we have the appropriate resources and expertise; invest in their knowledge, skill development and engagement on climate; and assess and modify incentives to align with sustainability.						
	External Engagement: <ul style="list-style-type: none"> • Advocacy: Continue to advocate, consult and engage with government, regulators and standard-setters at the enterprise or line of business level to support the Bank's objectives and our clients' decarbonization efforts. • Philanthropy: Continue to support climate-related initiatives within the communities we serve. 						
Grow	Support Client Decarbonization and Invest in Innovation	Climate-related Opportunities Process: Continue to enhance our process to identify, assess, prioritize and monitor short-, medium- and long-term climate-related opportunities in alignment with our sustainability business planning.					
	Support Client Decarbonization	Sustainable & Decarbonization Finance Target: Improve tracking of business activities that contribute towards our \$500B by 2030 Sustainable & Decarbonization Finance Target.					
		Client Engagement: In alignment with our sustainability business plans, engage with our clients on climate-related matters to identify commercial opportunities and assess and support them with their transition plans.					

Work underway to develop/mature a capability or reach a target/goal Ongoing refinement or business-as-usual efforts following maturation



Protect

Operating a complex financial institution in multiple jurisdictions exposes the Bank's businesses and operations to a broad range of financial and non-financial risks. Environmental and social issues, including climate change, expose the Bank to a set of risks (collectively, E&S risk) that are transverse, meaning that they can drive financial and non-financial risks.

Defining Climate Risk

Climate risk is the risk of financial loss or other harm resulting from the physical and transition risks of climate change to the Bank, its clients or the communities in which the Bank operates. Climate risks include:

- **Physical risks** that arise from the consequences of a changing climate, including acute physical risks stemming from extreme weather events happening with increasing severity and frequency (e.g., wildfires and floods), and chronic physical risks stemming from longer-term, progressive shifts in climatic and environmental conditions (e.g., rising sea levels and global warming).
- **Transition risks** that arise from the process of shifting to a low-carbon economy, influenced by new and emerging climate-related public policies and regulations, geopolitical factors including energy and food security, existing and potential litigation, changing societal demands and preferences, technologies, stakeholder expectations and legal developments.

How TD Manages E&S Risk

TD applies a risk-based approach in the ordinary course of making business decisions. We evaluate customers in accordance with consistent risk management guidelines, policies, standards and procedures, and consider risk factors unique to customers and transactions. Risk identification and assessment processes are a core part of how the Bank manages risk, and these processes are embedded throughout the organization in governance processes, risk programs and practices. This includes conducting risk-based analysis for all significant financial and non-financial risks the Bank faces, including E&S risks. As with any other financial or non-financial risks, the Bank has developed tools to identify, assess, monitor, mitigate and report E&S risks, including climate risks.

Management oversight of E&S risks is exercised through the integration of E&S considerations in existing risk management oversight committees.

Each quarter, the Bank conducts E&S Risk Appetite Statement (RAS) assessments at both the enterprise and business segment levels, which are reported by Enterprise Risk Management (ERM) to the Risk Committee of the Board (Risk Committee), the OROC, and the ERM.

Through the annual Enterprise Risk Catalogue refresh, business and corporate segments, as applicable, are required to assess their E&S risks, which are reviewed and challenged by ESG Risk Management.

The Enterprise E&S Risk Framework and associated policies and procedures provide clarity to business and corporate segments on requirements to identify and manage E&S risks. Enterprise, business and corporate segment risk policies and practices continue to evolve in response to changes in the internal and external environment.

- The Enterprise E&S Risk Framework provides a comprehensive overview of the Bank's approach to environmental and social risk management.
- The Enterprise E&S Risk Policy outlines the requirements and expectations for the effective management of E&S risk at TD, including roles and responsibilities across the three lines of defence.



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Climate-Related Risk Management Approach

1. Risk Identification and Assessment focuses on recognizing and understanding existing risks, risks that may arise from new or evolving business initiatives, aggregate risks, tail risks, emerging risks from the changing environment, and assessing the prioritization of those risks. In 2025, ESG Risk Management (ESG RM) reviewed the Bank's major risk categories (MRCs), risk appetite principles and measures to confirm that climate risk is considered across both financial and non-financial risk RAS assessments, evidencing how the risk is embedded in the Bank's risk management processes. This work also helped inform the expansion of the Bank's Guide to Climate Risk Identification, which now documents and provides examples of how climate risk drives financial and non-financial risk. To support first- and second-line colleagues' ability to identify climate risk in business activities, the Bank also developed an education session that was rolled out and made available to colleagues across the enterprise. This year, work continued to evolve the Bank's Physical Risk Classification Framework, which provides a consistent risk-classification definition to segment climate risk exposures, enabling the identification of higher-risk geographical areas. ESG RM also developed potential climate key risk indicators (KRIs), which would be intended to help segments identify sources of climate risks in their business activities, and efforts will continue to evolve the work. These new and maturing risk identification and assessment tools complement the Bank's Climate Risk Heatmaps, used to identify climate risk vulnerabilities across our lending business to prioritize our risk management activities for areas assessed as exposed to higher potential impacts (see [Heatmaps](#) for more information).

2. Measurement focuses on the Bank's ability to quantify risks – a key component of the Bank's risk management process. The Bank has processes in place to measure risks in order to provide timely and accurate quantification of the risks assumed. In 2025, the Bank submitted responses to OSFI's Standardized Climate Scenario Exercise (SCSE), which provided insights on potential climate-related impacts to TD's portfolios such as credit risk impacts to our non-retail portfolio under various transition risk scenarios (e.g., Net Zero 2050) and Canadian exposures that have the potential for heightened physical risks (e.g., floods). More importantly, development efforts and learnings (e.g., data availability/quality, estimation approaches, etc.) from the SCSE helped advance the Bank's internal climate scenario analysis capabilities for transition and physical risk assessments. The Bank leverages other tools and programs for climate risk measurement, including internal climate scenario analysis and RAS measures, which enables us to measure climate risks in major risk categories for applicable business segments (e.g., Real Estate Secured Lending (RESL) and insurance). The Bank has implemented an online E&S risk assessment tool, the E&S Hub, which improved risk workflow and created technological flexibility for future changes. The E&S Hub includes tools for conducting climate-related financial risk assessments of non-retail clients, which represent one of several inputs into the Bank's overall risk assessment of credit reviews.

3. Control processes are established and communicated through the Risk Committee and management-approved policies, and associated management-approved procedures, control limits, and delegated authorities, which reflect risk appetite and risk tolerances. The governance and control environment includes the Bank's E&S Risk Policy and related policies, second-line oversight, E&S RAS and first- and second-line accountabilities relating to ESG risk management practices. Specific examples of climate risk controls are property insurance-related considerations within the credit risk policies, standards and procedures as risk mitigants against physical risk events impacting loan collaterals.

4. Monitoring and Reporting of risk levels is conducted on a regular basis against the Bank's risk appetite, and Risk Management reports on its risk monitoring activities to senior management, the Board and its committees, and appropriate executive and management committees. See the [Risk Management](#) section for more information. For E&S risks, including climate risk, this includes regular reporting to the Bank's risk management leadership team, OROC, Risk Committee and quarterly RAS reporting to Enterprise Risk Management.

The Bank's climate risk management activities also support the Enterprise Sustainability Transition Program (ESTP). For more information about the ESTP, see the [Enterprise Sustainability Transition Program](#) section.



Protect continued

Identifying and Managing Climate-Related Risks

TD's Guide to Climate Risk Identification is intended to help risk owners identify the impacts that climate change may have on the Bank, its assets and its clients. In 2025, the Guide was enhanced across the Bank's MRCs to illustrate the transverse nature of the risk and how it can manifest in TD's business model, activities and value chain, along with expected timeframes for the occurrence of effects associated with climate risk.

TD's Guide to Climate Risk Identification

Credit Risk

Credit Risk	The risk of loss if a borrower or counterparty in a transaction fails to meet its agreed payment obligations.
How Climate Risk Impacts the Risk	Climate risk may be a contributing factor to credit risk. Physical and transition-related climate events can impact clients' operations, value of collateral, stranded assets, increased regulatory costs and increased loan losses due to reduced product demands in concentrated sectors/industries.
How We Manage the Risk	<ul style="list-style-type: none"> • TD maintains Climate Risk Heatmaps, developed using a sensitivity scale for our RESL, Non-Retail Lending, Indirect Auto Lending, and the Bank's Own Real Estate portfolios to identify and assess physical and transition risks, and support the prioritization of risk management activities. • The Bank's Climate Scenario Analysis Framework and Physical Risk Classification Framework provide consistent procedural and methodological guidelines for climate risk-related measurement exercises to quantify the financial impact of climate risks. • The Bank maintains climate risk factors in our internal risk rating used as one of the tools for the Bank to manage a diversified loan portfolio to reduce the risk of undue concentration. TD implemented the E&S Hub, an online E&S risk assessment tool with improved risk assessment and monitoring capabilities that incorporates the Borrower Climate Change Assessment Tool for conducting climate-related financial risk assessments of non-retail clients, which is one of several inputs into the Bank's overall risk assessment of credit reviews. • TD incorporates third-party analytical solutions to strengthen the ability to identify and assess financial impacts of climate risk into credit assessments and we continue to enhance our Climate Credit Risk Dashboard to provide more granular insights into how climate risk may manifest within the credit portfolio.
Time Horizon	Medium-term, long-term

Impacts of Climate Risk to Credit Risk

Physical Risk	Transition Risk
<p>The risk of financial loss due to the inability of the Bank's clients to repay loan obligations because of physical climate risk impacts that could create additional financial pressures. Examples include:</p> <ol style="list-style-type: none"> 1. Risk of reduced property value due to unrepaired damages or impaired marketability of collateral assets caused by physical risk event(s). 2. Risk of business losses due to interruption of operations and/or supply chain due to physical risk events. 	<p>The risk of financial loss due to the inability of the Bank's clients to repay loan obligations resulting from transition risk impacts that could create additional financial pressures. Examples include:</p> <ol style="list-style-type: none"> 1. Risk of significant increase in costs and/or capacity outlay to manage government policy changes and to invest in sustainable technologies or infrastructure. 2. Risk of manufacturing capacity constraint or stranded assets due to abrupt changes in business strategy, processes, or market conditions/consumer preferences.



Protect continued

Insurance Risk

Insurance Risk	The risk of financial loss due to actual experience emerging differently from expectations in insurance product pricing and/or design, underwriting, reinsurance protection and claims or reserving, either at the inception of an insurance or reinsurance contract, during the lifecycle of the claim or at the valuation date.
How Climate Risk Impacts the Risk	Physical climate risk events increasing in frequency and severity may lead to higher claim costs and reinsurance premiums, which could result in greater earnings volatility.
How We Manage the Risk	<ul style="list-style-type: none"> • TD Insurance (TDI) manages the risk of financial loss by continually evolving product design and pricing. TDI's property and casualty (P&C) insurance policies are yearly contracts which allow for adjustments in product and pricing in the short term to reflect changes in the external environment, and a greater focus on consumer loss prevention. • TDI continues to invest in both its internal capabilities, including climate-related metrics and externally supplied vendor capabilities such as a model specialized in forward-looking climate scenarios. TDI, along with other regulated financial institutions, participated in OSFI's Standardized Climate Scenario Exercise, a foundational step to advance climate scenario analysis capability as a tool to manage climate risk. • TDI employs a robust reinsurance program that utilizes a diversification of reinsurers and assessments of each reinsurer's credit risk. TDI successfully sponsored its new catastrophe bond, the first of its kind in Canada, which will provide TDI additional reinsurance capacity through a multi-year risk transfer of C\$150 million in protection against earthquakes and severe convective storms. • The management and oversight of climate-related risks impacting TDI is supported by the TDI Risk Committee, comprised of senior leaders, the Climate Risk Taskforce, with a mandate to advance climate risk management, and a robust Accumulation Management Policy to manage concentration risk in the areas in which TDI operates. Furthermore, TDI formed the Climate Advisory Board, comprised of external experts from Canada's top universities and Engineers Canada to inform TDI's climate resilience strategy and risk management through knowledge transfer, research and guidance.
Time Horizon	Short-term, medium-term, long-term

Impacts of Climate Risk to Insurance Risk	
Physical Risk	Transition Risk
<p>The risk of financial impacts to the Bank due to greater than expected insurance losses resulting from catastrophic weather events. Examples include:</p> <ol style="list-style-type: none"> 1. The risk of material financial loss to TDI and the Bank resulting from year-over-year increases in insurance claims and reinsurance premiums due to a single and/or multiple, severe climate-related events. 2. The risk that an insurer is unable to secure reinsurance and/or offer insurance coverage in high-hazard geographic locations, resulting in loan loss risks if collateral is damaged due to physical risks.* <p>*This example illustrates the link between Insurance and Credit risks.</p>	<p>The risk of financial impacts to the Bank and its customers resulting from policies that delay climate-related actions/transition to lower carbon economy, exacerbating physical risks. Examples include:</p> <ol style="list-style-type: none"> 1. The risk of polarized public policies across jurisdictions due to the lack of alignment and cooperation amongst insurance supervisors and industry players.* 2. The risk of accelerating changes in regulatory expectations for disclosures, modelling and climate risk reporting.* <p>*These examples illustrate the link between Insurance and Compliance risks.</p>



Protect continued

Strategic Risk

Strategic Risk	The risk of sub-optimal outcomes (including financial losses) arising from the Bank's strategic choices, execution of our strategies, responses to disruption (e.g., technological advancements or unforeseen competitive shifts) and regulatory shifts, or tail risk exposures (i.e., low probability events that can result in large or unquantifiable losses, material intervention or action from regulators). Strategic choices may span ongoing business operations and inorganic (mergers and acquisitions and strategic partnerships) activities.
How Climate Risk Impacts the Risk	Pursuing the wrong strategy, inadequate planning and/or strategy execution, misalignment with the Bank's lending portfolio against emerging regulatory changes, and competitors moving faster to manage climate risks and opportunities can drive strategic risk for the Bank.
How We Manage the Risk	<ul style="list-style-type: none"> The Bank uses scenario analysis and related analytics to help identify risks and inform prioritization of climate risk management activities. The Enterprise Sustainability Transition Program and ESG RM supported Business Segments to develop the first iteration of their sustainability strategies, which identify climate risks and related opportunities and feature defined actions and measures. The Enterprise Sustainability Management Committee (ESMC), comprised of senior leadership from the lines of business across the Bank, was established to oversee management of sustainability-related decision-making and the sustainable finance strategy. The Bank developed and delivered Foundations of Climate Risk voluntary training to both first- and second-line colleagues and executives across the enterprise. ESG RM provides regular engagement with colleagues and executives through existing forums, committees and business-as-usual meetings, including ongoing second-line oversight and review and challenge of escalations with climate-related risks.
Time Horizon	Short-term, medium-term, long-term

Impacts of Climate Risk to Strategic Risk	
Physical Risk	Transition Risk
<p>The risk of financial loss due to the Bank's inability to remain strategically resilient to physical climate risk impacts to its and/or its clients' business strategies. Examples include:</p> <ol style="list-style-type: none"> The risk of financial impact due to lack of adequate identification and execution of revenue-generating opportunities to mitigate physical risks to the Bank and its clients. The risk of financial and brand value loss as the Bank's competition/Bank's clients' competition move faster to market with revenue-generating opportunities to mitigate physical risks. 	<p>The risk of financial loss due to the Bank's inability to remain strategically resilient to transition risk impacts to its and/or its clients' business strategies. Examples include:</p> <ol style="list-style-type: none"> The risk that public policy changes to accelerate the transition or slow the transition to a lower-carbon economy increase the risk of financial loss to the Bank. The risk that TD clients abruptly shift their business models to higher-carbon/lower-carbon products and services.



Protect continued

Operational Risk (excluding Data, Technology and Cybersecurity)

Operational Risk (excluding Data, Technology and Cybersecurity)	The risk of loss resulting from inadequate or failed internal processes, people or external events and also includes losses related to legal risk events and regulatory fines.
How Climate Risk Impacts the Risk	A severe weather event can cause financial loss to the Bank due to increased operational costs, impact to critical third-party vendors' ability to operate and/or interrupt their supply chain and impact the Bank's ability to provide essential business or shared services in accordance with legal/regulatory obligations.
How We Manage the Risk	The Bank maintains an enterprise-wide business continuity and crisis management program that supports management's ability to operate the Bank's businesses and operations (including providing customers access to products and services) in the event of a crisis or business disruption incident. All areas of the Bank are required to maintain and regularly test business continuity plans to maintain resilience and facilitate the continuity and recovery of business operations. This program is supported by formal crisis management measures so that the appropriate level of leadership, oversight and management is applied to incidents affecting the Bank.
Time Horizon	Medium-term, long-term

Impacts of Climate Risk to Operational Risk (excluding Data, Technology and Cybersecurity)	
Physical Risk	Transition Risk
<p>The risk of operational impacts resulting from extreme weather events. Examples include:</p> <ol style="list-style-type: none"> 1. Direct physical damage to the Bank's infrastructure, including branches, data centers, or offices due to extreme weather events causing service disruptions and financial losses, such as repair cost, recovery costs and customer compensation. Such extreme weather events could increase security risks, exposing the Bank to criminal activity and looting. 2. The risk of supply chain/distribution disruption resulting in higher input costs, lost productivity, higher productivity costs and delayed product deliveries for the Bank and its customers/clients. 	<p>The risk of operational impacts due to transition risk. Examples include:</p> <ol style="list-style-type: none"> 1. The risk of abrupt regulatory changes or new regulations that result in a prolonged disorderly transition may disrupt supply chains/third parties whose business models rely on carbon-intensive industries or products.

Market Risk (Trading)

Market Risk (Trading)	The risk of loss in financial instruments held in trading portfolios due to adverse movements in market factors. These market factors include interest rates, foreign exchange rates, equity prices, commodity prices, credit spreads and their respective volatilities.
How Climate Risk Impacts the Risk	Trading: Climate risk could lead to a breakdown in correlations between assets or a change in market liquidity for particular assets, undermining risk management assumptions.
How We Manage the Risk	<ul style="list-style-type: none"> • Trading Market Risk proactively engages with trading lines of business to understand how emerging climate-related risks may impact portfolios, market dynamics, client demands, and risk-taking activities. • The existing market risk stress testing framework includes climate risks (e.g., commodity price shocks and extreme weather events).
Time Horizon	Immediate (0-3 months)

Impacts of Climate Risk to Market Risk (Trading)	
Physical Risk	Transition Risk
<p>The risk of loss in financial instruments held in trading portfolios due to a physical climate event driving adverse movements in market factors. Examples include:</p> <ol style="list-style-type: none"> 1. The risk of decrease or loss on investments and/or trading due to physical damage affecting the market value of the investment and/or trading portfolio. 2. The risk of financial impacts from changes in the value of Bank and client assets and liabilities due to market fluctuations resulting from physical risk events and/or anticipation of such events. 	<p>The risk of loss in financial instruments held in trading portfolios due to transition risks driving adverse movements in market factors. Example include:</p> <ol style="list-style-type: none"> 1. The risk of abrupt changes in market pricing, supply of, and demand for, certain products and services due to climate-related risks and opportunities.



Protect continued

Compliance Risk

Compliance Risk	The risk associated with the Bank's failure to comply (with letter or intent) with key federal and provincial/state banking, securities, trust and insurance laws, regulations, regulatory guidelines, voluntary codes and public commitments (regulatory requirements) and other TD policies related to TD's activities and practices with respect to business conduct and market conduct, as well as regulatory requirements applicable across the Bank, which can lead to fines, sanctions, liabilities, or reputational harm that could be material to the Bank.
How Climate Risk Impacts the Risk	Federal, state and provincial – as applicable – laws, regulations and regulatory expectations in the jurisdictions where the Bank operates may present different expectations for financial institutions' disclosures on managing climate risks and opportunities. Climate risk may drive the risk of fines and/or penalties resulting from misalignment with laws, regulations, etc. across the jurisdictions where the Bank operates.
How We Manage the Risk	<ul style="list-style-type: none"> Continued engagement and discussions with regulators, industry organizations and governments about legal and regulatory expectations and disclosure requirements relating to climate risk management. The Bank developed and delivered educational sessions to first- and second-line colleagues across the enterprise in relation to regulatory expectations for external disclosures and climate-related factors. The Bank's E&S Risk Policy sets out requirements for the development and review of sustainability-related products, services and public commitments.
Time Horizon	Short-term, medium-term, long-term

Impacts of Climate Risk to Compliance Risk	
Physical Risk	Transition Risk
<p>The risk of financial harm relating to the Bank's inability to manage the impacts of physical climate risks. Example includes:</p> <ol style="list-style-type: none"> The risk of increased regulatory fines and penalties resulting from the Bank's clients'/ customers inability to conduct their regular banking activities. 	<p>The risk of financial loss due to penalties and fines resulting from the Bank's inability to effectively address legal and/or regulatory developments related to climate risk mitigation, adaptation or disclosure. Examples include:</p> <ol style="list-style-type: none"> The risk of increased regulatory fines resulting from the inability to comply with changing legal and regulatory expectations. The risk of increased operational costs and risk of financial harm due to competing jurisdictional expectations and requirements.



Protect continued

Heatmaps

Our Climate Risk Heatmap (“the Heatmap”) was developed in 2021 as a foundational tool to identify and assess the Bank’s exposure to climate-related risks. It visually represents the Bank’s sensitivity to mid- to long-term climate-related risks given our portfolio composition, and supports our understanding of how climate risks might affect the Bank through our clients’ exposure to climate risk impacts (i.e., severe weather). These sensitivities to climate risk drivers are based on inherent risk assessment of the industry sector and do not represent the risk specific to TD’s clients. The impact to our clients depends on factors such as the location of physical assets, business activities, and management action taken to mitigate the risks (e.g., the ability of a borrower to absorb the costs of transition) and is assessed case-by-case as relevant for the individual lending transaction. The Heatmap was developed in accordance with the TCFD-defined categories that consider transition risk factors, and physical risk driven by both acute and chronic climate hazards. We have created heatmaps for the following sectors: Non-Retail, Real Estate Secured Lending, Indirect Auto Lending and Own Real Estate Operations. The heatmaps have helped us prioritize areas of focus for the development of scenario analysis exercises used to measure the impacts of climate-related risks.

Low Impact High Impact

Heatmap: Non-Retail

Our non-retail heatmap uses a sensitivity scale we developed to show the potential impact (i.e., low to high) across various transition and physical risks, while also considering the potential impact to overall industry sector earnings. Sensitivities are determined based on both qualitative and quantitative analysis over a 10-year forward-looking horizon to the overall industry sector. These sensitivities to climate risk drivers are based on an inherent risk assessment of the industry sector and do not represent the risks specific to TD’s clients. The impact to our clients depends on factors such as the location of physical assets, business activities, and management action taken to mitigate the risks (e.g., the ability of a borrower to absorb the costs of transition). Our non-retail heatmap visualizes our portfolio’s sensitivities to climate risks and helps us prioritize internal risk analytics and monitoring.

Counterparty Type	Industry Sector	Transition Risk	Physical Risk	Gross Credit Risk Exposures (\$ millions) ¹	Gross Credit Risk Exposures as % of Total Non-Retail
Non-Retail ^{2,3}	Real Estate			\$104,702	11.4%
	Agriculture			\$13,973	1.5%
	Automotive			\$21,788	2.4%
	Financial			\$108,002	11.8%
	Food, Beverage and Tobacco			\$15,185	1.7%
	Forestry			\$2,527	0.3%
	Government, Public Sector Entities and Education			\$430,168	47.0%
	Health and Social Services			\$34,564	3.8%
	Industrial Construction and Trade Contractors			\$11,708	1.3%
	Metals and Mining			\$9,451	1.0%
	Oil and Gas			\$10,522	1.2%
	Power and Utilities			\$33,717	3.7%
	Professional and Other Services			\$36,293	4.0%
	Retail Sector			\$15,699	1.7%
	Sundry Manufacturing and Wholesale			\$25,499	2.8%
	Telecommunications, Cable and Media			\$13,779	1.5%
	Transportation			\$12,250	1.3%
	Other			\$14,783	1.6%
	Total (Non-Retail)			\$914,610	100.0%
	Total (Retail and Non-Retail)			\$1,764,817	

¹ As reported under Basel Pillar 3 CRB (e) columns A, B and C; see [TD's 2025-Q4 Supplemental Regulatory Disclosure](#), page 25, Line #9, where the total (retail and non-retail) gross credit risk exposures (excluding counterparty credit risk exposures to repo-style transactions and over-the-counter (OTC) derivatives) amounts to \$1,764,817. Sector exposures shown in the Climate Risk Heatmaps can differ from the sector exposures in the [Financed Emissions](#) section of the Sustainability Report. This is because TD uses industry-aligned sector classifications for financed emissions, whereas gross credit risk exposures are based on Basel Pillar 3 sector classifications. Furthermore, for financed emissions, to better reflect emissions impacts, some exposures are manually reclassified between sectors where appropriate (e.g., government utilities and power generation facilities have been moved into “Power and Utilities” from “Government, Public Sector Entities and Education”).

² The scope of the heatmap includes certain gross credit risk exposures, namely, loans, debt securities and deposits with other financial institutions. It reflects TD’s banking book positions and excludes the insurance business.

³ Commercial real estate is included in the non-retail heatmap.



Protect continued

Heatmap: Real Estate Secured Lending (RESL)

The RESL heatmap uses a similar sensitivity scale to show the potential impact to residential homeowners and the Bank (i.e., low to high) across various transition and physical risks, considering the impact on property value as a result of anticipated property damage due to climate-related risks. The sensitivities are determined based on both a qualitative and quantitative analysis for a forward-looking horizon from now to 2030 in the applicable geographic locations. The sensitivities to climate risk drivers are based on an inherent risk assessment for Canada RESL and U.S. RESL, where there is no consideration of mitigation measures (e.g., loan-to-value ratios, insurance coverage, ability of a borrower to absorb the cost of physical risk events). We provide a granular view of the acute physical risk ratings, considering three hazard types: flood, wildfire and hurricane. Each hazard risk is evaluated at the individual asset level (for each individual residential property), and then aggregated to the jurisdictional level, incorporating insights from both expert judgment and third-party analytics providers based on likelihood or intensity of the physical event at the location and the expected property damage. This view provides a snapshot of our portfolios' sensitivities to each hazard type. Country-level acute physical risk ratings for the RESL heatmap were arrived at by taking the maximum hazard rating.

Low Impact High Impact

Counterparty Type	Jurisdiction	Transition Risk	Physical Risk	Outstanding Loan Balance (\$ millions)	% of Total RESL
Retail	Canadian Real Estate Secured Lending (RESL)			\$415,396	87%
	U.S. RESL			\$60,075	13%
	Total			\$475,471	100%

Low Impact High Impact

Counterparty Type	Jurisdiction	Physical Risk		
		Acute		
		Flood	Wildfire	Hurricane
Retail	Canadian Real Estate Secured Lending (RESL)			
	U.S. RESL			



Protect continued

Heatmap: Indirect Auto Lending

The indirect auto lending heatmap uses a similar sensitivity scale to show the potential impact to the client (i.e., low to high) across various transition and physical risks, considering the impact to indirect auto lending sector earnings.²⁷ The sensitivities are determined based on both a qualitative and quantitative analysis over a 10-year forward-looking horizon. The sensitivities to climate risk drivers are based on an inherent risk assessment, where there is no consideration of mitigation measures (e.g., loan-to-value ratios, insurance coverage, ability of a borrower to absorb the cost of physical risk events).

Low Impact High Impact

Counterparty Type	Jurisdiction	Transition Risk	Physical Risk	Outstanding Loan Balance (\$ millions)
Consumer Installment and Other Personal	Indirect Auto Lending (Canada and U.S.)			\$76,319

Heatmap: Own Real Estate Operations

The own real estate operations heatmap uses a similar sensitivity scale to show the potential impact (i.e., low to high) on the Bank’s own real estate operations property values as a result of anticipated property damage due to acute physical risk. For the applicable geographic locations, the sensitivities consider three hazard types: flood, wildfire and hurricane, and are determined based on both a qualitative and quantitative analysis for a forward-looking horizon from now to 2030. Each hazard risk is evaluated at the individual asset level then aggregated to the jurisdictional level, incorporating insights from both expert judgment and third-party analytics providers based on the likelihood or intensity of the physical event at the location and the expected property damage. The sensitivities are based on an inherent risk assessment, where there is no consideration of mitigation measures (e.g., insurance coverage).

Low Impact High Impact

Jurisdiction	Physical Risk		
	Acute		
	Flood	Wildfire	Hurricane
Operations in Canada			
Operations in the U.S.			

The heatmaps involve an iterative process, where the framework and methodology will continue to be refined over the next few years, as capabilities and data availability improve. We will also continue to assess opportunities to expand the scope of our heatmaps to cover additional portfolios across TD’s assets and operations.



Protect continued



Assessing Exposure to Physical Risks

In addition to the Heatmap, TD conducts other assessments to measure the potential exposures of assets and business activities that are vulnerable to physical climate risks.

Catastrophic events can increase volatility in the Bank's insurance business results and adversely affect liquidity, profitability and financial condition. Refer to [TD's 2025 Annual Report](#) for further details. We continue to monitor the financial impacts arising from climate-related risks across the Bank.

TDI Cross-Industry Metric

To evaluate exposure to climate-related physical risks, TDI leveraged its Economic Capital Model to develop a physical risk measure for the Insurance business. The model aggregates losses from key perils – flood, hurricane, severe convective storm, winter storm, and wildfire – to estimate the 1-in-100 years Probable Maximum Loss (PML), net of reinsurance. The excess PML over planned catastrophe cost is expressed as a percentage of Insurance Revenue, providing a clear indicator of potential financial impact from climate events.

The measure provides a consistent baseline for reviewing the effectiveness of TDI's underwriting, reinsurance, and broader risk management strategies.

TDI Climate-related Physical Risk Measure: 5.67% of FY25 TDI Insurance Revenue

Physical Risk Classification Framework

To assess the amount and percentage of credit lending exposures that may be vulnerable to climate-related physical risks, the Bank developed a Physical Risk Classification Framework, with the initial implementation focusing on RESL exposures. The framework establishes a four-tier classification hierarchy (Very High, High, Medium, Low) of geographical sensitivity and damage potential to physical risk perils under current and future climate conditions. The outputs from the framework are used to provide additional insights for portfolio-level risk monitoring and to support other internal risk management activities.



Protect continued

Assessing Exposure to Transition Risks

To further support our transition risk assessment, the carbon-related assets metric represents the amount and percentage of assets associated with sectors that are relatively more vulnerable to transition risks. This metric provides a quantitative measure of exposure to higher transition risk sectors and supports the prioritization of the Bank’s risk analytics and monitoring.

Carbon-Related Assets

Carbon-Related Assets Relative to Total Assets is a climate-related risk metric that measures exposure to carbon-related assets relative to our total (retail and non-retail) gross credit risk exposure (excluding counterparty credit risk exposures to repo-style transactions and over-the-counter (OTC) derivatives).²⁸ This metric is used to monitor the shift of concentrations in exposures that have higher sensitivity to climate transition risk over time.

TCFD’s 2021 implementation guidance recommends that banks define carbon-related assets as “those assets tied to the four non-financial groups identified by the Task Force in its 2017 report” (Energy, Transportation, Materials and Buildings,

and Agriculture, Food and Forest products), with consideration for the exclusion of “industries or sub-industries that are appropriate to exclude, such as water utilities and independent power and renewable electricity producer industries.”²⁹ Following this guidance, TD’s total exposure to carbon-related assets totalled \$266 billion as of October 31, 2025, or 15.1% of our total gross credit risk exposure.

In accordance with TCFD’s 2021 guidance, borrowers within the following sub-industries have been excluded from TD’s carbon-related assets calculation: water utilities, waste management systems, renewable electricity producers, and nuclear electricity producers. We completed a review of borrowers’ operations and, where applicable, included exposures deemed to be carbon-related in the metric calculation to address the potential limitation that some carbon-related exposures may exist outside of TCFD’s four non-financial groups (e.g., government/public sector entities engaged in power generation).

The Bank’s approach to calculating carbon-related assets will continue to evolve as TD considers the application of industry guidance, standards and best practices.

	2025		2024		2023	
	\$ Millions ^{2,3,4}	As % of Total Assets ^{1,5}	\$ Millions ^{2,3,4}	As % of Total Assets ^{1,5}	\$ Millions ^{2,3,4}	As % of Total Assets ^{1,5}
Total carbon-related assets ⁶	\$266,145	15.1 %	\$272,490	15.3 %	\$261,867	15.7 %
Carbon-Related Assets by TCFD Category						
Energy	\$31,187	1.8 %	\$30,879	1.7 %	\$30,000	1.8%
Transportation	\$34,620	2.0 %	\$38,745	2.2 %	\$35,515	2.1%
Materials and Buildings	\$152,947	8.7 %	\$160,393	9.0 %	\$155,995	9.4%
Agriculture, Food and Forest Products	\$31,738	1.8 %	\$28,262	1.6 %	\$26,180	1.6%
Other	\$15,652	0.9 %	\$14,211	0.8 %	\$14,177	0.9%

1 See [TD’s 2025-Q4 Supplemental Regulatory Disclosure](#), page 25, Line #9, where the total (retail and non-retail) gross credit risk exposures (excluding counterparty credit risk exposures to repo-style transactions and over-the-counter (OTC) derivatives) amounts to \$1,764,817, and represents Total Assets for the purpose of the Carbon-Related Assets Relative to Total Assets climate-related risk metric.

2 Refer to the footnote above for the basis of the carbon-related assets calculation. In addition, adjustments have been made in accordance with how carbon-related assets are defined by TCFD’s 2021 Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures, which states “those assets tied to the four non-financial groups identified by the Task Force in its 2017 report,” with consideration for exclusion of “industries or sub-industries that are appropriate to exclude, such as water utilities and independent power and renewable electricity producer industries”. Available at: https://assets.bbhub.io/company/sites/60/2021/07/2021-TCFD-Implementing_Guidance.pdf.

3 To address the potential limitation that some carbon-related exposures pertaining to the TCFD’s four non-financial groups may be classified in other industry sectors, a review of borrowers’ operations was completed. In cases where government and public sector entities engaged in power generation were deemed to be carbon-related, applicable exposures were reclassified to the Power and Utilities industry sector and included in the carbon-related metric calculation.

4 Millions are rounded to the nearest dollar value.

5 Percentages are rounded to one decimal point.

6 The Bank’s carbon-related assets and carbon-intensive sectors metrics are distinct but complementary measures of exposure to climate-sensitive sectors. Carbon-related assets follow TCFD guidance and support the prioritization of climate transition risk management activities. Carbon-intensive sectors follow industry guidance across four PCAF asset classes and support sustainability strategy development.

Capital Deployed Towards Climate-Related Risks

The Bank continues to invest in managing climate-related risks by strategically deploying capital to build and support internal capabilities. In 2025, the Bank continued to deploy capital towards data and tool enhancements, including the Enterprise Climate Data Solution to support climate risk and emissions-related reporting, and the Environmental and Social Risk Hub to enable process improvements for climate-related assessments within non-retail lending transactions. Capital was allocated to the onboarding of specialized vendors, ensuring access to climate data and analytics that support the Bank in assessing physical and transition risk, as applicable, in non-retail, residential lending and insurance portfolios. The Bank continues to invest in internal risk management teams and supporting staff, including model development teams, through ongoing learning in sustainability topics and training in risk management practices.



Protect continued

Scenario Analysis

Scenario analysis is an important risk management tool where exercises are designed to support the objectives of risk identification and measurement. Climate scenarios represent a forward-looking view of potential impacts from climate-related events. Recognizing the inherent uncertainty of upcoming climate-related changes and their impacts, climate scenarios are not intended to be forecasts of the future, but instead represent a hypothetical view in order to evaluate potential risk impacts. Among other impacts, these scenarios can be used to support the identification and assessment of potential financial impacts of climate-related risks.

Our Climate Scenario Analysis Program supports the measurement of climate-related physical and transition risks in our key portfolios across a range of industry-recognized scenarios over the short, medium and long terms. Climate scenario analysis exercises are used to assess and assist in our understanding of potential future climate impacts and vulnerabilities, inform our risk management processes, and align with regulatory requirements. The exercises we run consider both physical and transition risk scenarios, and are primarily based on the sources below:

- **Physical Risks:** Scenarios derived from the Intergovernmental Panel on Climate Change (IPCC) reports, including assessing physical risk impacts from various Representative Concentration Pathways (e.g., RCP 8.5).
- **Transition Risks:** Scenarios derived from the Network for Greening the Financial System (NGFS) reports on potential transition pathways, as well as scenarios derived from our local regulatory bodies (e.g., OSFI/ Bank of Canada).

Our exercises have focused on understanding impacts to key major risk categories and identifying climate-related risk factors and potential exposures. Our Climate Scenario Analysis framework outlines processes to assess potential impacts of climate-related risks, including risk identification, defining requirements, scenario generation, and estimating, analyzing and reporting impacts. The Climate Scenario Analysis framework is expected to mature in line with growing internal capabilities, as well as evolving industry and regulatory developments.

In 2025, we completed OSFI's [SCSE](#), which applied to all federally regulated financial institutions (FRFIs). For TD, this includes an assessment of our deposit taking (banking) and insurance businesses. The exercise supported the key objectives of strengthening our understanding of potential exposures to climate change and building our capacity to assess the impact of climate-related catastrophic events. Lessons from that exercise have been integrated into our internal climate scenario analysis plans and approaches.

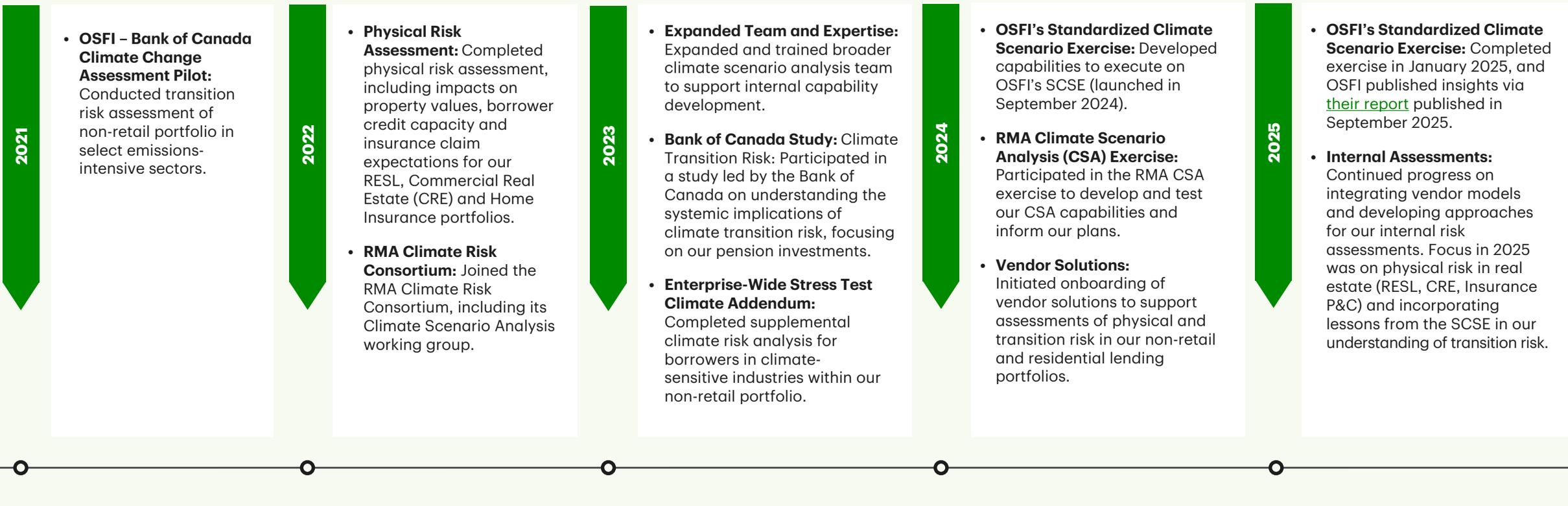
In addition, we continued to develop our internal approaches to assess the impacts of physical climate risks, with an emphasis on key portfolios highlighted through our analytical activities, including lending exposures and the insurance business. For example, the internal assessments on RESL provided useful insights into the potential financial impact stemming from climate risks by exploring the use of climate-adjusted credit metrics to conceptualize the flood risk impact on property damages. We recognize the uncertainty inherent in the hazard models used for the assessment and inherent limitations associated with approaches and assumptions developed to quantify the financial impact; as such, the insights, at this stage, are for internal informational purposes only. We will continue to refine and enhance the internal approaches as our understanding of physical climate risks matures and our capabilities grow.



Protect continued

Our Progress on Scenario Analysis

We continue to develop our internal capabilities to support both regulatory exercises (completion of OSFI's SCSE) and our internal risk assessments. This work has helped us identify how potential future climate risks could impact our customers and our operations in order to inform our risk management discussions.





Protect continued

Our climate risk heatmaps are a tool that have helped us to prioritize sectors and geographic locations for risk assessment and measurement work based on scenario analysis. The following chart highlights the areas our internal scenario analysis capabilities and exercises currently cover. We continue to develop and enhance our approaches in these areas to provide useful insights, as well as identify and prioritize other areas for further analysis.

	Credit Risk		Insurance Risk	Operational Risk
Climate-Related Risk	Residential Real Estate	Non-Retail Lending	Insurance P&C	Bank Operations
Physical Risks (Acute) Impact of extreme weather events (e.g., flood, hurricane, wildfire and severe convective storms)	Canadian and U.S. mortgages and home equity portfolio	Canadian and U.S. Commercial Real Estate portfolio	Canadian home insurance and small business insurance portfolios	TD's business operations
Transition Risks Risk related to various policy, legal, technology and market changes	Not assessed yet	Canadian and U.S. non-retail borrowers in emissions-intensive sectors	Not assessed yet	Not assessed yet



Adapt

Managing climate-related risks and opportunities requires the right talent, capabilities and tools. We are focused on developing climate-focused talent; enhancing our measurement and reporting capabilities; investing in data, technology and analytics; and engaging with governments, regulators, standard-setters, industry and organizations.

People and Talent

As part of the Enterprise Sustainability Transition Program, we created a cross-functional workstream to support TD's sustainability education initiatives, including learning and development opportunities related to climate change.

For example, in 2025, the Bank developed and delivered Foundations of Climate Risk training to first- and second-line-of-defence colleagues and executives across the enterprise. This training was made available to further colleagues' knowledge of climate change, climate risks and the roles and responsibilities of the three lines of defence.

For more examples of our sustainability education initiatives, see the [Sustainability Education and Development](#) section.





Adapt continued

Capabilities and Tools

Measurement and Reporting Capabilities

Operational Emissions

Addressing our operational emissions helps to adapt our business to be more resilient to the impacts and costs of climate change.

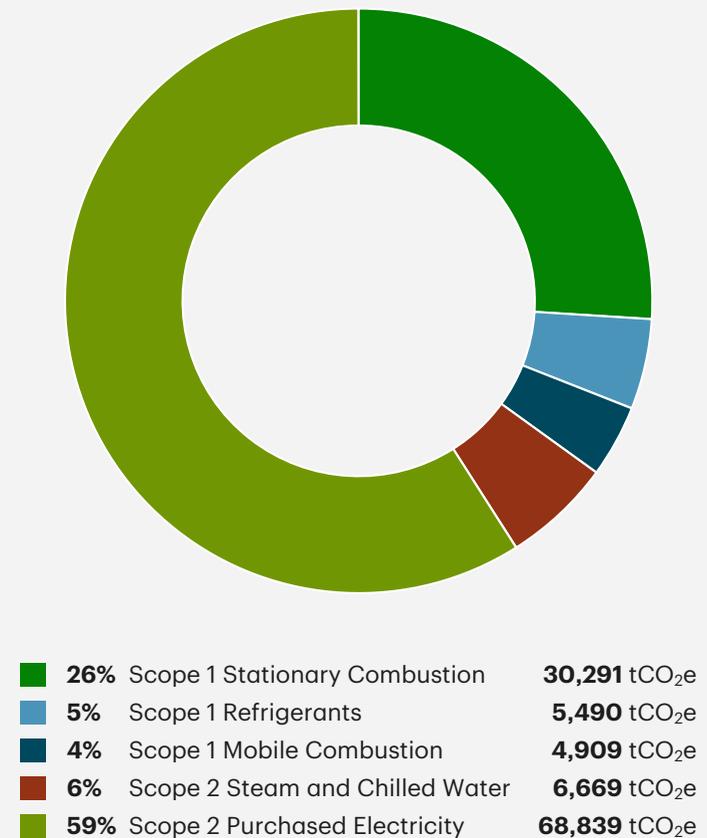
Footprint

Our operational emissions footprint encompasses our Scope 1 and Scope 2 emissions, as well as other Scope 3 non-financed GHG emissions.³⁰ The figures presented in this section are absolute gross GHG emissions.³¹ For details on our methodology, see “Our Approach to Calculating Operational GHG Emissions” in the [2025 Sustainability Performance Data Pack & Indices](#).

Scope 1 and 2 GHG Emissions

Our Scope 1 and 2 GHG emissions are attributed based on the organizational boundary set for our company, which includes our owned and leased buildings. The chart to the right summarizes the sources of our Scope 1 and 2 GHG emissions and shows that more than half of these emissions are derived from the generation of the electricity we purchase.

2025 Scope 1 and 2 GHG Emissions: Breakdown by Emissions Source (tCO₂e)³²





Adapt continued

Scope 1 and 2 GHG Emissions: Breakdown by Approach, Scope and Intensity Metrics^{1,2}

Scope 1 and 2 (Location-Based) ³	Units	2025	2024	2023	2019
Scope 1 ⁴	tCO ₂ e	40,690	39,292	40,346	52,628
Scope 2 ⁵	tCO ₂ e	75,507	76,179	76,970	110,221
Total Scope 1 and 2	tCO ₂ e	A 116,197	A 115,472	A 117,317	A 162,849
Facility GHG Emissions Intensity	kgCO ₂ e per square foot	5.3	5.1	5.3	6.7
Revenue GHG Emissions Intensity	tCO ₂ e per millions in revenue	1.7	2.0	2.3	3.8
Scope 1 and 2 (Market-Based)					
Scope 1 ⁴	tCO ₂ e	40,690	39,292	40,346	52,628
Scope 2 ^{5,6}	tCO ₂ e	6,669	5,350	6,930	8,100
Total Scope 1 and 2	tCO ₂ e	A 47,359	A 44,642	A 47,276	A 60,728
Facility GHG Emissions Intensity	kgCO ₂ e per square foot	2.2	2.0	2.1	2.5
Revenue GHG Emissions Intensity	tCO ₂ e per millions in revenue	0.7	0.8	0.9	1.4

1 See "Our Approach to Calculating Operational GHG Emissions" in the [2025 Sustainability Performance Data Pack & Indices](#) for details on our organizational boundary, reporting period, and other key details related to our footprint. Totals may not add up due to rounding.

2 TD's 2025 GHG inventory excludes WOW vans and ATM trucks, as these are data-limited and insignificant to our operational emissions footprint.

3 In accordance with the GHG Protocol's Scope 2 Guidance, TD reports both location-based and market-based Scope 2 GHG emissions figures. The location-based approach accounts for emissions from the electricity physically delivered to a company (i.e., it reflects the average emissions intensity of grids on which energy consumption occurs). The market-based approach represents Scope 2 emissions based on how an organization buys its energy (i.e., it derives emission factors from contractual instruments, such as green power contracts or renewable energy certificates).

4 TD's Scope 1 GHG emissions include direct emissions from heating (e.g., natural gas) and cooling (e.g., refrigerants), and leased vehicles.

5 TD's Scope 2 GHG emissions include indirect emissions from electricity, heating (purchased steam) and cooling (purchased chilled water).

6 Market-based Scope 2 emissions reflect the purchase of renewable energy certificates (RECs) to account for our global electricity consumption. The remaining emissions in market-based Scope 2 are attributed to steam and chilled water.

Scope 3 Non-Financed GHG Emissions³³

TD reports on the following Scope 3 non-financed GHG emissions categories:^{34,35}

- Category 1:** Purchased goods and services – upstream GHG emissions from the production of tangible (i.e., goods) or intangible (i.e., services) products purchased or acquired by TD.
- Category 2:** Capital goods – upstream GHG emissions from the production of capital goods (fixed assets such as equipment, machinery, buildings, facilities and vehicles).
- Category 3:** Fuel- and energy-related activities – GHG emissions related to the production of fuels and energy purchased and consumed by TD that are not included in Scope 1 or 2.
- Category 6:** Business travel – GHG emissions from the transportation of employees for business-related activities in vehicles owned or operated by third parties (e.g., aircraft, trains).
- Category 8:** Upstream leased assets – GHG emissions from the operation of assets leased by TD in the reporting year and not included in Scope 1 or 2.
- Category 13:** Downstream leased assets – GHG emissions from the operation of assets that are owned by TD and leased to other entities that are not included in Scope 1 or 2.

The chart below outlines the year-over-year evolution of our Scope 3 non-financed GHG emissions, including our base-year results.

Category	Units	2025 ^{1,2}	2024	2023	2019
Category 1: Purchased Goods and Services	tCO ₂ e	1,281,291	1,144,923	1,053,692	627,428
Category 2: Capital Goods	tCO ₂ e	91,182	104,032	71,736	156,813
Category 3: Fuel- and Energy-Related Activities	tCO ₂ e	21,547	22,231	22,882	32,166
Category 6: Business Travel ³	tCO ₂ e	A 29,830	A 37,877	A 37,373	A 17,154
Category 8: Upstream Leased Assets ⁴	tCO ₂ e	A 424	A 391	—	—
Category 13: Downstream Leased Assets ⁵	tCO ₂ e	A 387	A 412	A 474	A 848

1 In 2025, the percentage of emissions calculated using data obtained from suppliers or value chain partners was as follows: Purchased Goods and Services – 0%; Capital Goods – 0%; Fuel- and Energy-Related Activities – 100%; Business Travel – 82%; Upstream Leased Assets – 100%; and Downstream Leased Assets – 100%.

2 TD applies the spend-based method to calculate emissions from Scope 3 Category 1 – Purchased Goods and Services and Category 2 – Capital Goods; the average data method for Category 3 – Fuel- and Energy-Related Activities; the spend-, fuel- and distance-based methods for Category 6 – Business Travel (depending on the mode of travel); and the asset-specific methods for Category 8 – Upstream Leased Assets and Category 13 – Downstream Leased Assets.

3 Business travel includes emissions from commercial air travel, chartered jets, rail travel, car rentals and personal vehicles used for business travel. For commercial air travel and rail travel, the activity data comprises distance travelled. For chartered jets, the activity data comprises fuel consumed. For car rentals, the activity data comprises distance travelled and fuel consumed. For personal vehicles, the activity data comprises mileage claims reimbursed to TD employees. In 2025, TD restated its 2023 and 2024 GHG inventories to reflect the inclusion of business travel data from Cowen Inc., which was not available at the time of acquisition in 2023. This restatement added 9,225 tCO₂e to 2023 and 9,070 tCO₂e to 2024, primarily from air travel emissions. The Cowen business travel data is fully integrated in 2025 and will be included going forward. The decrease in business travel emissions between 2024 and 2025 is due to a significant update to the Department for Environment, Food & Rural Affairs' (DEFRA) business air travel emission factors for 2025 – resulting in lower factors – rather than changes in distance travelled.

4 Upstream leased assets include emissions from spaces leased by TD that are subleased to a third party. Activity data comprises direct energy data (e.g., kWh of electricity consumed). The first year this data was disclosed was 2024.

5 Downstream leased assets include emissions from spaces owned by TD that are leased to a third party. Activity data comprises direct energy data (e.g., kWh of electricity consumed).

For details on our methodology, see "Our Approach to Calculating Operational GHG Emissions" in the [2025 Sustainability Performance Data Pack & Indices](#).

Adapt continued

Operational Emissions Target (Scope 1 and 2 GHG Emissions)

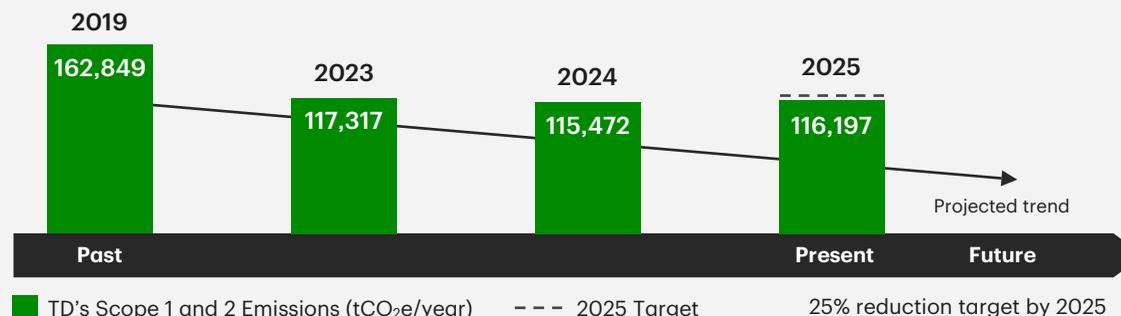
In 2021, we announced our interim target to achieve an absolute reduction in our location-based Scope 1 and 2 GHG emissions of 25% by 2025, relative to a 2019 baseline.³⁶ This interim target was aligned with a science-based 1.5°C pathway and, while TD is not a member of the Science Based Targets initiative (SBTi), we used the SBTi’s internationally recognized methodology, specifically the Absolute Contraction Approach, which allows for annual decreases in absolute GHG emissions to reach net zero by 2050.³⁷ This interim target is a gross absolute reduction target, meaning the target can only be achieved through absolute emissions reductions. We do not use carbon credits or renewable energy certificates to achieve our interim target.

As of the end of 2025, we have reduced our location-based Scope 1 and 2 GHG emissions by 29% compared to our 2019 baseline, thereby exceeding our 25% reduction target. On a year-over-year basis, TD’s location-based Scope 1 and 2 GHG emissions increased by 0.6% to 116,197 tonnes of CO₂e in 2025 compared to 2024 due primarily to a colder winter in Canada.

Renewal of Operational Emissions Target (Scope 1 and 2 GHG Emissions)

Having achieved our first interim target aligned to a net zero by 2050 pathway, we have set the next interim target to achieve an absolute reduction in our location-based Scope 1 and 2 GHG emissions of 46.2% by 2030, relative to a 2019 baseline. This target continues to align with a science-based 1.5°C pathway.

Operational Emissions (Scope 1 and 2 Location-Based GHG Emissions) (tCO₂e)



We recognize that achieving this level of GHG emissions reduction will require continued investment in energy-efficiency improvements, as TD has done successfully in the past (see the Addressing Operational GHG Emissions section on the next page). While all 1.5°C pathways make assumptions about future external conditions – such as the pace of electricity-grid decarbonization – current policy-based projections indicate steady progress. If this progress were to slow relative to 2024 expectations, it could influence the pace of emissions reductions.

For the renewal of our operational emissions target (Scope 1 and 2 GHG emissions), our 2019 baseline has been revised to 119,305 tonnes of CO₂e, 27% lower than the baseline of 162,849 tonnes of CO₂e for our 2025 target. Our interim 2030 target is to reach 64,186 tonnes of CO₂e in 2030. See the next section for more details. TD continues to focus on implementing resource efficiency measures in order to reduce Scope 1 and 2 GHG emissions in

line with our 2030 target and will monitor and report progress against this target annually.

Our Approach to Operational Emissions Target (Scope 1 and 2 GHG Emissions) Boundaries

Our 2025 (and prior years’) Scope 1 and 2 emissions footprint (as well as our previous 2025 target) is defined on the basis of operational control, interpreted through an enterprise-aligned lens, as referenced in the “Scope 1 and 2 GHG Emissions: Breakdown by Approach, Scope and Intensity Metrics” table on the previous page. Under this approach, we include emissions from all owned and leased facilities, regardless of whether or not we have the ability to influence energy and emissions reduction measures. This approach captures a broader set of locations in our absolute emissions disclosure.

Our 2030 Scope 1 and 2 emissions reduction target has been established with consideration of the emissions under TD’s operational control; however, interpreted through an influence-aligned lens, where we include emissions only from those facilities and activities where we have the authority to implement and directly influence emissions reduction measures. For example, emissions from some landlord managed buildings are excluded, as TD does not have the ability to directly influence energy use or efficiency improvements in those spaces. TD will continue to include the majority of its leased locations where it maintains authority over utility meters and can implement GHG emissions reduction initiatives.

TD does not have direct influence over emission reduction measures of all leased spaces captured under the operational control boundary, and therefore, has excluded such leased spaces when setting the 2030 reduction target. TD remains committed to environmental stewardship across our footprint and will continue to work with landlords to drive decarbonization through green leases, data sharing and joint initiatives on landlord-controlled capital and operational investments outside of lease terms.



Adapt continued

Addressing Operational GHG Emissions

Efficiency Gains³⁸

We continued to address our operational GHG emissions through several initiatives:

- **Hybrid heat pumps:** In 2023, TD began piloting hybrid heat pumps in select locations to replace end-of-life mechanical units. As of 2025, TD has completed over 35 installations in Canadian retail locations, with over 95 units installed where utility emissions are more favourable when converting from gas to electricity.
- **Smart Retail Controls (SRC) program:** Introduced in 2018, SRCs provide real-time visibility, remote monitoring and performance assessment for multiple retail locations in Canada and the U.S. SRCs enable remote monitoring of energy consumption, optimization of equipment operation and temperature control. Since the 2019 baseline, SRCs have been installed at approximately 1,500 locations, resulting in over 6,400 tonnes of CO₂e savings annually.
- **Assess, Engineer, Install (AEI) initiative:** Building on the SRC foundation, the AEI initiative was introduced to support heating, ventilation and air conditioning (HVAC) retrofits within TD's branch network. Leveraging connected building data and engineering analysis, AEI supports comfort and decarbonization efforts by optimizing unit sizing, pairing scopes and integrating controls.
- **Solar energy:** We have equipped branches and stores across Canada and the U.S. with on-site solar panels. Currently, over 160 locations have solar systems, generating over 2.4 million kWh of energy. To maximize the performance and longevity of existing solar installations, we launched a solar revitalization program across U.S. locations to assess, repair and implement ongoing monitoring of on-site solar panel production to prevent degradation over time.
- **Light-emitting diode (LED) lighting:** We continue to complete lighting conversion projects, replacing traditional fixtures with high-efficiency LED lighting across branches in Canada and the U.S. In addition, our construction standards for prototype buildings are energy efficient, incorporating elements from LEED standards.
- **Fuel switching:** We have transitioned heating systems from oil or propane to natural gas at targeted locations to help reduce GHG emissions, improve reliability and lower operational risk associated with legacy fuel sources.
- **Engaging on supply chain emissions:** Emissions from TD's purchased goods and services are a significant contributor to our Scope 3 non-financed GHG emissions, and we recognize that there are opportunities to support decarbonization across our supply chain and in our procurement practices. We encourage our suppliers to complete a custom questionnaire, which includes data such as emissions, to strengthen our overall understanding of supplier sustainability practices.
- **Fleets:** In 2025, we updated our U.S. and Canadian fleet policies to require hybrid vehicles for renewals, as available, to help reduce our overall Scope 1 emissions. As of December 2025, 27% of our fleet was either hybrid or on order.

Challenges

Landlord Data Quality and Availability

We rely on primary activity data (e.g., invoices and meter readings) as mainly reported by the landlords to calculate our operational GHG emissions where possible, and secondary data (e.g., estimation techniques as described in "Our Approach to Calculating Operational GHG Emissions" in the [2025 Sustainability Performance Data Pack & Indices](#)) where primary data is not available.

Challenges related to the quality and consistency of primary activity data reported by the landlords remain, as we progress toward our Scope 1 and 2 GHG emissions target. TD Enterprise Real Estate collects this information from major landlords for GHG inventory reporting; however, data integrity and quality control measures of landlords cannot be seen or audited. We will continue to work with landlords and/or use best estimations where required to augment auditable data.

External Landscape

Our inability to influence external factors (e.g., electricity grid improvements and weather events) continues to impact our progress on achieving our Scope 1 and 2 GHG emissions target. To mitigate this challenge, TD continuously monitors external developments and remains flexible about the decarbonization initiatives it employs. These initiatives may include real estate portfolio, design, capital retrofit plans, location closures and mergers, return-to-office plans and fleet electrification.



Adapt continued

Carbon Credits

Carbon credit markets play a role in global efforts to reduce GHG emissions by incentivizing projects that either avoid or remove carbon from the atmosphere. These markets support the development of innovative climate solutions and enable organizations to compensate for residual emissions. TD is committed to advancing the integrity and impact of carbon credit markets by prioritizing high-quality, independently verified credits, including permanent carbon removal technologies. Through strategic investments and partnerships, we are focused on addressing our own emissions and supporting market growth, innovation and community benefits.

Our priority is to first reduce GHG emissions to the greatest extent possible. Over time, we plan to voluntarily address residual emissions through investments in carbon dioxide removal (CDR) technologies. This approach follows the principle of mitigation hierarchy, which recommends that organizations establish milestones for the use of CDR credits and shift toward permanent carbon removal solutions over time. It also adheres to the Intergovernmental Panel on Climate Change (IPCC), which explains that CDR is necessary to achieve reductions in global atmospheric GHGs, in line with the Paris Agreement.³⁹ By some estimates, direct air capture and storage, which is one of several carbon dioxide removal approaches, has a mitigation potential of six to 40 gigatonnes of CO₂e per year by 2050,^{40,41} indicating that the overall mitigation potential of multiple carbon dioxide removal technologies may be significant in aggregate.

What are Carbon Credits?

Carbon credits generally represent one metric tonne of CO₂e that has been removed from the atmosphere, or that has been prevented from entering the atmosphere relative to business-as-usual, by an eligible project following a prescribed methodology or protocol. Carbon credits can be classified as either reduction/avoidance, or removal, or a combination of both.

- **Reduction/avoidance credits** are generated by projects that reduce or avoid GHG emissions that would otherwise have been emitted to the atmosphere (e.g., energy efficiency projects).
- **Removal credits** are generated by projects (e.g., direct air carbon capture, forest carbon sequestration projects, enhanced ocean alkalinity) that remove GHGs from the atmosphere, such as green materials and geological or marine sinks. Depending on their technology, some of these projects can claim “permanent” carbon removals (i.e., verified removal credits from projects with carbon storage lasting 10,000+ years with low risk of reversal).⁴²

Since 2010, we have voluntarily compensated for our Scope 1 and 2 GHG emissions (market-based) and Scope 3 Business Travel emissions⁴³ by purchasing independently verified carbon credits from projects within our footprint that avoid or reduce emissions that would otherwise have been emitted to the atmosphere.⁴⁴ These credits are not used to meet our Scope 1 and 2 GHG reduction target.⁴⁵

In 2025, TD strengthened its approach through the exclusive use of carbon removal credits to compensate for Scope 1 and 2 GHG emissions (market-based). Prioritizing credits that permanently remove CO₂ from the atmosphere is considered a higher-impact intervention on the mitigation hierarchy compared to avoidance credits. We will also continue to purchase a broad range of carbon credits, such as reduction/avoidance credits, to compensate for our Scope 3 Business Travel emissions. We believe that reduction credits support a diversified carbon credit portfolio, as illustrated by Will Solutions (see 2025 Project Highlights on the next page).



Adapt continued

Carbon Credits and Renewable Energy Certificates Retirement Schedule⁴⁶

TD used 77,189 independently verified carbon reduction and removal credits, equivalent to TD's 2025 market-based Scope 1 and 2 emissions and Scope 3 Category 6: Business Travel emissions.⁴⁷ TD also used 397,246 renewable energy certificates (RECs), equivalent to TD's 2025 non-renewable energy consumption, which is accounted for when calculating our market-based Scope 2 emissions. For more information, see the "Carbon Credits and Renewable Energy Certificates Retirement Schedule" in the [2025 Sustainability Performance Data Pack & Indices](#).

Our Enterprise Guidance for Carbon Credit and Energy Attribute Certificate Purchasing came into effect in 2024, and is informed by the increasing quality standards in these areas and sets out principles and minimum criteria designed to support the business and scientific integrity. Our Enterprise Guidance applies to new purchases of carbon instruments by TD.⁴⁸ We intend to periodically review and, where appropriate, update our internal guidance based on relevant developments.

TD's Investment in Carbon Dioxide Removal

Current industry guidance proposes the use of permanent CDR credits for residual, hard-to-abate emissions.⁴⁹ Demand for CDR credits is projected to increase as more organizations seek to remove carbon from the atmosphere over the next 20 years. Our Climate Action Plan includes securing offtake agreements for permanent CDR credits, such as 1PointFive⁵⁰ in 2023 and Charm Industrial in 2025. These agreements enable us to provide our clients with an opportunity to access CDR credits on the voluntary market, and also secure a supply to voluntarily compensate for our own residual operational emissions. These efforts are intended to deepen our relationships with key clients, and support the development of carbon removal technologies and carbon markets.

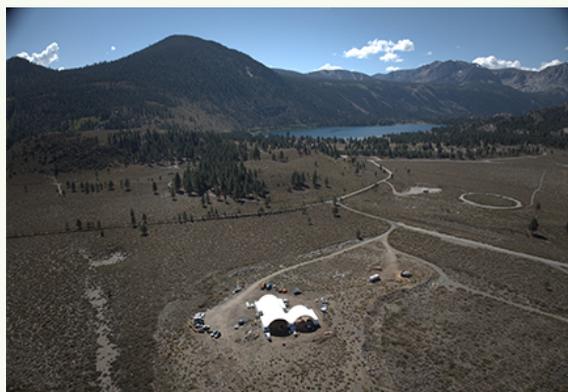
As the voluntary carbon market for permanent CDR credits is still in the early stages compared to the projected supply needed by 2050, we continue to diversify our portfolio across technologies. For example, we recognize that direct air capture (DAC) projects have developed rapidly in recent years with credits on recognized registries and, as such, will be part of our future portfolio. However, we also believe that other technologies that allow for permanent removal, such as the technology developed by Charm Industrial, can complement our voluntary carbon credit portfolio, which consists of high-quality verified emissions reduction and/or nature-based credits.

2025 Project Highlights

Project Name	Type of Carbon Credits	Project Description
Charm Industrial	Removal credits	In the U.S., TD secured a 10-year offtake agreement with Charm Industrial, a carbon removal company employing innovative pyrolysis to convert biomass residues into bio-oil and biochar to support permanent carbon removal from the atmosphere. TD will begin to use the independently verified carbon removal credits starting in 2029. See the case study on the next page for additional information on this project.
Chestnut	Removal credits	In the U.S., TD partnered with Chestnut, a developer of nature-based carbon removal credits. See the case study on the next page for additional information on this project.
Anew	Removal credits	In Canada, TD partnered with Anew, an organization that offers a diversified portfolio of decarbonization solutions. TD has committed to purchasing carbon removal credits that support enhanced sustainable forest management practices on lands owned by the Quinte Conservation Authority.
Will Solutions	Reduction/avoidance credits	In Canada, we worked with Will Solutions to retire avoidance credits stemming from their activities, which supported small and medium-sized enterprises with energy retrofits across the communities we serve, and broadened our carbon credit portfolio.

Adapt continued

Case Study: Charm Industrial



Charm Industrial employs innovative fast pyrolysis technology to convert biomass residues into bio-oil and biochar. This bio-oil is injected deep underground, where it polymerizes and remains immobile for thousands of years, ensuring permanent carbon removal from the atmosphere. The co-produced biochar is used as a soil amendment, providing durable carbon storage and agricultural benefits. Instead of relying on large, centralized facilities, Charm uses small, modular pyrolyzers placed close to biomass sources and injection sites, including forests at risk of catastrophic wildfires. This decentralized approach accelerates deployment and allows for scaling. It also supports

communities affected by wildfires by reducing overall wildfire severity and reducing smoke hazards. Charm’s approach not only helps enrich agricultural soil through biochar, but it also supports other industrial applications due to its high overall carbon utilization, such as using gasified bio-oil to produce low-carbon iron for low-carbon materials.

Charm is the first carbon removal company with two types of carbon removals carrying the Core Carbon Principle (CCP) label from the Integrity Council on the Voluntary Carbon Market (ICVCM). The company ensures that the credits they offer are durable, verifiable and additional (i.e., representing real carbon removals that would not have occurred without the project). Charm’s bio-oil storage locations are monitored semi-annually following injection, and permanently capped once the bio-oil has become immobile. All removals are registered with and verified by Isometric, a registry leader. For more information on our 10-year offtake agreement, see the [press release](#).

Case Study: Chestnut

Chestnut Carbon is a U.S.-based developer of high-quality, nature-based carbon removal credits. Established in 2022 with support from Kimmeridge, an energy-focused alternative asset manager, Chestnut specializes in sourcing carbon credits exclusively from privately owned, at-risk U.S. forests. Its Improved Forest Management (IFM) projects are designed to meet the most rigorous Verified Carbon Standard (VCS) criteria, ensuring the credits they offer are durable, verifiable and additional.

With close to 200,000 acres of forestland enrolled across 37 U.S. states, Chestnut partners with landowners of all sizes, offering them a unique revenue share from carbon markets as an alternative to traditional timber sales. Their member lease agreements enforce restrictions on timber harvesting for a minimum of 60 years – longer than most other IFM projects – ensuring long-term sequestration and conservation. The project is Forest Stewardship Council® certified (FSC® C1801518), ensuring that when harvests occur, they are meeting the highest forest sustainability requirements.

A cornerstone of Chestnut’s integrity is its use of proprietary, patented monitoring, reporting and verification (MRV) technology, enabling highly accurate tree inventory measurements and scalable, cost-effective project oversight. Its credits are routinely audited by third-party experts to guarantee accuracy and transparency. Beyond carbon sequestration, Chestnut’s projects deliver significant co-benefits, including improved air and water quality, enhanced wildlife habitats and greater climate resilience for rural communities. Chestnut also aligns its outcomes with the United Nations Sustainable Development Goals, including Clean Water and Sanitation, Climate Action and Life on Land.

By combining scientific rigour, strong landowner partnerships and advanced technology, Chestnut sets a new innovative standard in sustainable forest management that we are proud to support. Our four-year agreement will help ensure TD uses CDR credits for our full Scope 1 and Scope 2 market-based emissions footprint in the U.S.⁵¹ For more information on this agreement, see the [press release](#).



Adapt continued

Financed Emissions

Financed emissions refer to our clients' Scope 1, Scope 2 and, in some sectors, Scope 3 emissions that, under applicable international standards, are attributable to the Bank based on the proportion of the Bank's lending to or investing in the client company. These emissions represent the largest component of our GHG emissions footprint, accounting for 98% of the Bank's total GHG emissions.

While TD actively manages its own Scope 1 and Scope 2 emissions, our financed emissions are influenced by client activities and broader market dynamics beyond our direct control. TD conducts and supports business across a range of high-carbon sectors that remain integral to global energy and resource security. These sectors need financing to both operate and transition their businesses. In addition, the pace of the energy transition is shaped by factors such as government policy, technological advancements, consumer behavior and other external influences. As a result, our ability to directly influence client emissions is limited to the services and advice we provide at a client's request.

Consistent with our commitment to transparency, we continue to measure and report on financed emissions. Leveraging our expertise and in response to client demand, we also support certain clients in their own internally defined decarbonization efforts along with commercialization of innovative clean technologies across industry sectors. This report outlines that work and provides data on our overall financed emissions, while acknowledging the structural and market factors that shape these outcomes.

The 2030 interim financed emissions targets for four sectors (Energy, Power Generation, Automotive Manufacturing and Aviation) encompass the majority of the financed emissions attributed to the Bank, including 71% of non-retail financed emissions and 66% of combined retail and non-retail financed emissions calculated to date.⁵² For more information, see the [Footprint Versus Targets](#) section. To calculate these percentages, financed emissions of clients in-scope for the target are compared to the total financed emissions. While we recognize that decarbonization progress in the real economy is dependent on external factors such as technology commercialization, consumer behaviour and supportive policy, portfolio-level reporting on financed emissions helps us understand how our clients are progressing against overall sector decarbonization pathways.

Financed emissions have limitations when considered alone due to the volatility of the underlying variables. For example, financed emissions trends are highly sensitive to market fluctuations and changes in company valuations (e.g., Enterprise Value Including Cash (EVIC)), which can have a greater impact than

changes in actual emissions levels in some cases. To address these limitations, we continue to explore complementary metrics to provide a more comprehensive view. At TD's 2025 Annual General Meeting, 38.3% of shareholders supported a proposal requesting that the Bank disclose an Energy Supply Finance Ratio (ESFR). Since then, relevant teams within TD have developed an internal methodology and are completing initial calculations for TD's ESFR. We remain committed to reviewing our approach to climate action and supporting metrics, and we continue to report annually on our \$500 billion by 2030 Sustainable & Decarbonization Finance Target. As disclosure and industry standards evolve, we will continue to track and evaluate sector best practices with respect to an ESFR and will continue to consider disclosure in our sustainability reporting.

Ongoing Enhancements to Financed Emissions Estimations

As emissions reporting, industry guidance and measurement methodologies evolve, TD recognizes the importance of maintaining consistency and comparability in our reported GHG emissions. We have established the TD Environmental Metrics Restatement Guideline, aligned to the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard requirement. This internal guideline establishes the circumstances under which the Bank will restate previously reported financed emissions and targets, and the significance threshold that triggers recalculation and restatement of emissions data. The drivers of restatement are:

- Methodology updates reflecting new regulations or industry guidance,
- Improvement in data availability and changes in data sources,
- Shifts in organizational boundaries, such as acquisitions or divestments, or
- Identification of errors.

We anticipate that improvements in data coverage, quality and availability, as well as updates to the International Energy Agency (IEA) Net Zero Emissions (NZE) scenarios, may enable us to improve the accuracy of emission estimations. As a result, we may review and update emission footprints and targets or disclose restatements. For more information, see [Caution Regarding Forward-Looking Statements](#).



Adapt continued

Footprint

TD's financed emissions footprint reflects our clients' GHG emissions that, under applicable international standards, are attributed to the Bank based on our lending and investments, expressed in megatonnes of carbon dioxide equivalent (MtCO₂e), and calculated using the internationally recognized methodology developed by the Partnership for Carbon Accounting Financials (PCAF) in accordance with the Part A: Financed Emissions Standard 2nd Edition (2022). This approach is widely adopted by systemically important financial institutions globally and provides a consistent basis for comparability across the industry.

We report financed emissions on an absolute basis for on-balance sheet investments and lending exposures. We also disclose these emissions on an absolute committed lending basis for business loans and investments (see the "Financed Emissions Results" section of the [2025 Sustainability Performance Data Pack & Indices](#)). We use the Financed Emissions Lending Intensity (FELI) metric to monitor the financed emissions level on a per dollar lent/invested basis.

In 2025, we expanded financed emissions footprint coverage to account for 100% of financing and investment exposures in each of the carbon-intensive sectors⁵³ for which TD provides disclosure. Specifically, financed emissions from the Commercial Real Estate portfolio now include all financing and investment exposures (previous results included exposures to Real Estate Investment Trusts only), and the Utilities sector now includes waste and water sub-sector exposures. These enhancements provide a more comprehensive view of the financed emissions profile and improve our ability to assess climate-related risks and opportunities across all relevant carbon-intensive sectors.

Data Availability

We use the most current data available for the applicable reporting years, at the time we calculate financed emissions, in accordance with PCAF guidance.⁵⁴ Non-retail footprint and interim target metrics were calculated using external data sources, including S&P Global Trucost 2019–2023 emissions data. For each sector, we aim to provide an estimate that includes most parts of the value chain, even if client-reported data is not available, by using PCAF emission factors and/or our third-party data provider estimates (see [Key Insights](#) for more information). Retail asset classes (i.e., Consumer Auto Loans and Residential Mortgages) also include 2024 estimates since data was available.

Asset Classes Disclosed

Our financed emissions footprint includes asset classes listed in the left column of the table below. We continue to refine our footprint calculations as PCAF guidance and the data landscape evolve. Asset classes under consideration for future disclosures are listed in the right column of the table.

Partnership for Carbon Accounting Financials (PCAF) Asset Classes ¹	
Asset Classes Included in Financed Emissions Footprint	Asset Classes Under Consideration for Future Reports
Listed Equity and Corporate Bonds* ²	Sovereign Debt ⁶
Business Loans and Unlisted Equity* ³	Facilitated Emissions (from Capital Market Activity)*
Mortgages	Insurance – Emissions
Motor Vehicles Loans	
Commercial Real Estate ⁴	
Project Finance* ⁵	

* These asset classes are included in scope of the four interim financed emissions targets.

¹ These reflect asset classes for which PCAF has published a methodology as of October 31, 2025. Additional asset class methodologies (e.g., Use of Proceeds Structures, Securitizations and Structured Products, and Sub-Sovereign Debt) were incorporated into the PCAF Standard A in its December 2025 update, after TD's fiscal year-end (i.e., October 31, 2025). We are currently assessing their applicability and significance for measurement and disclosure.

² The financed emissions footprint estimation previously included only Corporate Bonds. In 2025, we expanded our scope of coverage to achieve 100% inclusion of all exposures under this asset class for the disclosed carbon-intensive sectors.

³ The financed emissions footprint estimation previously included only Business Loans. In 2025, we expanded our scope of coverage to achieve 100% inclusion of all exposures under this asset class for the disclosed carbon-intensive sectors.

⁴ The financed emissions footprint estimation for this asset class previously included only Real Estate Investment Trusts exposures. In 2025, we estimated the financed emissions attributable to the Bank for the entire Real Estate portfolio. Due to challenges in obtaining collateral-level data, these emissions are currently calculated using PCAF's Business Loans and Unlisted Equity methodology instead of the Commercial Real Estate asset class methodology. We are actively working to address this data gap to enhance the accuracy of this estimation for future reporting.

⁵ For Project Finance, financed emissions attributed to TD have yet to be estimated in accordance with the PCAF Project Finance methodology. TD's portfolio of lending exposures for Project Finance is insignificant compared to our general-purpose business lending exposures. As a result, the financed emissions attributed to TD are estimated in accordance with PCAF's Business Loans and Unlisted Equity methodology.

⁶ Although we have developed a sovereign debt emissions methodology to meet bilateral reporting requirements as per OSFI's Climate-related Risk Return, our disclosed financed emissions footprint is currently based on industry-aligned carbon-intensive sectors, where Sovereign Debt exposures are excluded.



Adapt continued

Detailed Results by Sector and PCAF Asset Class (Investments and Drawn Lending Basis for Business Loans)^{1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17}

Sector ²	Business Loans, Investments ⁴																Retail Loans				Total ^{11,12}	
	Agriculture		Automotive		Aviation		Energy		Industrials		Other Transportation ¹⁷		Power and Utilities ¹⁶		Real Estate ^{3,16,17}		Consumer Auto ⁷		Residential Mortgages ⁸			
Financing Exposure (MM CAD \$)																						
2019	8,058	12,319	8,316	12,624	3,443	3,061	5,961	91,131	55,115	233,530	433,557											
2021	8,824	8,729	5,840	7,854	3,114	3,661	7,785	91,769	56,095	265,763	459,433											
2022	9,731	12,834	4,960	11,140	3,910	4,006	9,498	107,224	60,377	291,159	514,838											
2023	10,641	16,962	4,058	12,921	4,158	5,411	13,485	118,017	66,533	317,476	569,661											
2024	-	-	-	-	-	-	-	-	69,475	327,976	-											
% YoY ¹³	9%	32%	-18%	16%	6%	35%	42%	10%	4%	3%	11%											
Financed Emissions (MtCO₂e)																						
Scope ⁵	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3
2019	A 8.6	-	A 0.6	A 0.3	A 5.1	-	A 2.8	A 31.8	A 0.6	A 1.1	A 0.2	-	A 2.0	-	A 1.6	-	A 6.6	-	A 2.6	-	30.7	33.1
2021	A 10.6	-	A 0.4	A 0.5	A 3.3	-	A 1.6	A 15.2	A 0.3	A 0.8	A 0.3	-	A 1.9	-	A 1.7	-	A 5.8	-	A 2.2	-	28.2	16.4
2022	A 9.7	-	A 0.5	A 0.3	A 2.8	-	A 1.8	A 18.4	A 0.4	A 1.2	A 0.2	-	A 2.1	-	A 1.8	-	A 5.5	-	A 2.2	-	27.0	19.9
2023	A 11.1	-	A 0.7	A 0.7	A 2.0	-	A 1.9	A 21.7	A 0.4	A 1.1	A 0.3	-	A 2.4	-	A 1.9	-	A 5.5	-	A 2.2	-	28.5	23.5
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A 5.4	-	A 2.2	-	-	-
% YoY ¹³	15%		72%		-27%		17%		-5%		5%		14%		8%		-1%		-2%		11%	
Financed Emissions Lending Intensity (gCO₂e/CAD \$)																						
2019	1,072	74	615	2,737	485	67	332	18	120	11	147											
2021	1,198	105	557	2,137	353	94	250	19	104	8	97											
2022	994	65	566	1,817	401	61	222	17	91	7	91											
2023	1,046	85	502	1,831	359	48	179	16	82	7	91											
2024	-	-	-	-	-	-	-	-	78	7	-											
% YoY ¹³	5%	30%	-11%	1%	-10%	-22%	-19%	-2%	-5%	-5%	0%											
PCAF Data Quality Score (1-5)																						
Scope ⁵	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3	1-2	3
2019	A 5.0	-	A 4.5	A 2.0	A 4.7	-	A 3.6	A 3.6	A 4.1	A 4.3	A 4.9	-	A 4.0	-	A 4.7	-	A 2.2	-	A 4.5	-	-	-
2021	A 5.0	-	A 4.4	A 2.5	A 4.6	-	A 3.7	A 3.8	A 4.4	A 4.6	A 5.0	-	A 3.4	-	A 4.7	-	A 2.2	-	A 4.4	-	-	-
2022	A 4.9	-	A 4.3	A 2.3	A 4.7	-	A 3.3	A 3.8	A 4.1	A 4.4	A 5.0	-	A 3.5	-	A 4.6	-	A 2.2	-	A 4.4	-	-	-
2023	A 4.9	-	A 4.2	A 2.1	A 4.5	-	A 3.9	A 4.0	A 4.2	A 4.4	A 5.0	-	A 3.4	-	A 4.7	-	A 2.2	-	A 4.3	-	-	-
2024	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	A 2.2	-	A 4.3	-	-	-



Adapt continued

1 Exposures per sector included within the financed emissions footprint differ from gross credit risk exposures disclosed in the quarterly Supplemental Regulatory Disclosure, which is used in the climate risk heatmaps included in the [Protect](#) section of the Sustainability Report. This is because TD uses industry-aligned sector classifications for financed emissions, whereas gross credit risk exposures are based upon Basel Pillar 3 sector classifications. Furthermore, for financed emissions, to better reflect emissions impacts, some exposures are manually reclassified between sectors where appropriate (e.g., government utilities and power generation facilities have been moved into “Power and Utilities” from “Government services”).

2 Due to capacity constraints, focus was primarily placed on financed emission footprint estimation for industry-aligned carbon-intensive sectors; as such, all sectors defined by PCAF are not currently disclosed. The current priority sectors for financed emissions calculations are “Agriculture, Metals and Cement, Mining, Commercial and Residential Real Estate, Oil and Gas, Thermal Coal, Power and Utilities, Automotive, Aviation, and Other Transportation.” TD uses the North American Industry Classification System (NAICS) to classify portfolio exposures for these sectors. Given the significance (high or low) of some of these sectors to the financed emissions attributed to TD, we have combined Mining and Metals and Cement under “Industrials” and have combined Oil and Gas and Thermal Coal under “Energy.”

3 The financed emissions footprint estimation for this asset class previously included only Real Estate Investment Trusts exposures. In 2025, we estimated the financed emissions attributable to the Bank for the entire Real Estate portfolio. Due to challenges in obtaining collateral-level data, these emissions are currently calculated using PCAF’s Business Loans and Unlisted Equity methodology instead of the Commercial Real Estate asset class methodology.

4 For Project Finance, financed emissions attributed to TD have yet to be estimated in accordance with the PCAF Project Finance methodology. TD’s portfolio of lending exposures for Project Finance is insignificant compared to our general-purpose business lending exposures. As a result, the financed emissions attributed to TD are estimated in accordance with PCAF’s Business Loans and Unlisted Equity methodology.

5 The financed emissions footprint does not include clients’ Scope 3 emissions for all sectors due to data availability and quality constraints. Consideration will be given in the future to include Scope 3 emissions for additional sectors as data availability and quality improve. Similarly, for sectors where we calculate clients’ Scope 3 emissions, we are unable to do so for all components of the value chain. Specifically, in the Automotive sector, the calculated clients’ Scope 3 emissions only include Scope 3 downstream emissions associated with manufacturers of light-duty vehicles. In the Energy sector, the clients’ Scope 3 emissions only include downstream emissions.

6 Results are based on Exiobase v3.7 with base year 2015, which reflects PCAF’s version prior to March 2023. The Exiobase data has been treated for inflation up to 2018 and converted to USD using a 2018 exchange rate. Given we are using the previous database, the two-year time-lagged results do not yet reflect inflation to 2023. After our initial assessment, we discerned that inflation adjustments to 2023 did not have a significant impact on the footprint estimation.

7 Consumer auto loans (i.e., motor vehicle loans) include indirect loans executed through TD’s Auto Finance group. This footprint does not include personal loans secured by automobiles. In the absence of in-year statistics, the Canadian portfolio’s 2023 and 2024 estimated financed emissions are based on 2022 (the latest) average distance travelled published by Natural Resources Canada. Similarly, the U.S. portfolio’s 2024 estimated financed emissions is based on 2023 average distance travelled that is published by the US National Highway Traffic Safety Administration. Consumer auto loans emissions will be restated in future reports when more recent data is made available.

8 Residential mortgages exclude home equity lines of credit (HELOC) exposures in accordance with PCAF guidance. In the absence of in-year statistics, the estimated financed emissions for the Canadian portfolio in 2023 and 2024 are derived from 2022 energy consumption and emissions data published by Natural Resources Canada, as well as the 2022 grid emission factors from Environment and Climate Change Canada. Similarly, the U.S. portfolio’s 2024 estimated financed emissions are based on the 2023 grid emission factors published by the U.S. Environmental Protection Agency and the 2020 energy consumption statistics from the Residential Energy Consumption Survey by the U.S. Energy Information Administration. Residential mortgage emissions will be restated in future reports when more recent data is made available.

9 In line with our recurring practice, financed emissions for certain sectors are being restated to reflect retroactive enhancements to the source data as more clients report their emissions, or estimation methodologies improve. For example, this year, we refined our mapping of clients to sectors, allowing for increased consistency and comparability. As a result, financed emissions for many of the previously reported fiscal years have been restated this year in line with the TD Environmental Metrics Restatement Guideline to ensure consistency in the approach for restating emissions disclosures.

10 To date, TD has not addressed the occurrence of double or multiple counting of Scope 3 financed emissions in the footprint and progress to target estimations, despite being aware that estimations include instances of multiple counting. For example, the clients’ Scope 3 Category 11 emissions, from use of sold products, would be counted for both the Energy sector and the Automotive sector and the Scope 3 emissions associated with automobiles combusting gasoline would thus overlap and be included/counted more than once.

11 Totals may not add up due to rounding.

12 For the “Total” column, 2024 financed emissions for non-retail sectors are not reported. However, 2024 financed emissions for retail sectors (Consumer Auto Loans and Residential Mortgages) are reported. For PCAF Data Quality Score, Total is not applicable.

13 The “% YoY” row shows a comparison of 2024 versus 2023 for retail sectors (Consumer Auto Loans and Residential Mortgages) and 2023 versus 2022 for non-retail sectors. Furthermore, the “% YoY” row for the “Total” column shows a comparison of 2023 versus 2022 for all the carbon-intensive sectors (retail and non-retail).

14 To calculate the financed emissions, the most recent external data available for the applicable period is used.

15 For lending exposures, as defined by PCAF, Cowen does not have any exposures in-scope. For investments, as defined by PCAF, Cowen’s non-trading investments are in-scope; however, they are currently not reflected in the footprint as the exposures are insignificant. TD will continue to monitor these exposures and assess future inclusion in the footprint calculations.

16 In 2025, the scope of coverage was expanded for two sectors to better align with PCAF requirements. Firstly, we included financed emissions for water and waste utility clients in the “Power and Utilities” sector. Secondly, while in previous years we only disclosed financed emissions for REITs, this year, financed emissions are estimated across the entire “Real Estate” sector.

17 Certain sectors were renamed for clarity. “Shipping” was renamed “Other Transportation” and “CRE REITs” was renamed “Real Estate” to more clearly represent the refined scope of coverage for the sector.



Adapt continued

Key Insights

The majority of financed emissions attributed to TD arise from non-retail lending (81%), followed by retail lending (15%), with investments contributing the smallest portion of financed emissions attributed to the Bank (4%). The key insights below reflect financed emissions measured for investments and drawn lending exposures.

Total

- **Financed Emissions – Year Over Year (2022 to 2023):** Total estimated financed emissions increased 11%, in line with an 11% increase in total financing to carbon-intensive sectors and a decrease in company values (i.e., EVIC) in carbon-intensive sectors, such as the Energy sector. The outsized influence of EVIC on the results is a known challenge with the financed emissions metric (for more information, see [Challenges](#)).
- **Financed Emissions Lending Intensity (FELI) – Year Over Year (2022 to 2023):** TD's total FELI stayed flat year over year but decreased by 6% between 2021 and 2023. While these results indicate some progress on the decarbonization efforts of our clients, as well as growth in TD's lending to less carbon-intensive sectors and asset classes, they are subject to the same EVIC volatility challenges.
- **Insight:** These results, particularly FELI, could indicate an ability to grow our business while reducing emissions, in part through more emissions-efficient lending. However, results vary by sector due to unique emissions abatement potential.

Agriculture

- **Year Over Year (2022 to 2023):** Financed emissions from the Agriculture sector increased 15%, with a 9% increase in financing to this sector. Data quality in the Agricultural sector remains poor as only 3% of the financed emissions are based on company-reported data in 2023, and majority estimated through sub-sector average emission factors from PCAF. To help address methodology and data challenges in this sector, we joined several working groups this year, including one supporting the development of Canada-specific emission factors. Next year, we will assess how these efforts impact TD's financed emissions calculations, with the potential to benefit TD and the broader financial sector.

Automotive

- **Year Over Year (2022 to 2023):** Financed emissions from the Automotive sector increased 72% while drawn financing increased 32%. Although drawn financing increased the most for light-duty vehicle manufacturers, it is the only sub-sector within the Automotive sector to include Scope 3 downstream emissions, thus driving up financed emissions.

Energy

- **Year Over Year (2022 to 2023):** Financed emissions from the Energy sector increased 17%, in line with a 16% increase in financing to this sector. Decreases in company values and increases in financing had similar impacts, as both resulted in an increase in financed emissions. However, these were counteracted by a shift in portfolio financing towards less carbon-intensive clients, resulting in an overall negligible change in FELI compared to the previous year.

Power and Utilities

- **Year Over Year (2022 to 2023):** Financed emissions from the Power and Utilities sector increased 14% while financing increased 42%. In turn, FELI decreased by 19%, primarily due to increased financing to the renewable power generation sub-sector.

Real Estate

- **Year Over Year (2022 to 2023):** Financed emissions from the Real Estate sector increased 8%, in line with a 10% increase in financing, with a 2% decrease in FELI. Our financed emissions reporting for the Real Estate sector now includes all financing and investment exposures (previous results included exposures to Real Estate Investment Trusts only). In future reporting, we intend to improve TD's internal data to better align to PCAF methodology and improve our emissions estimations.

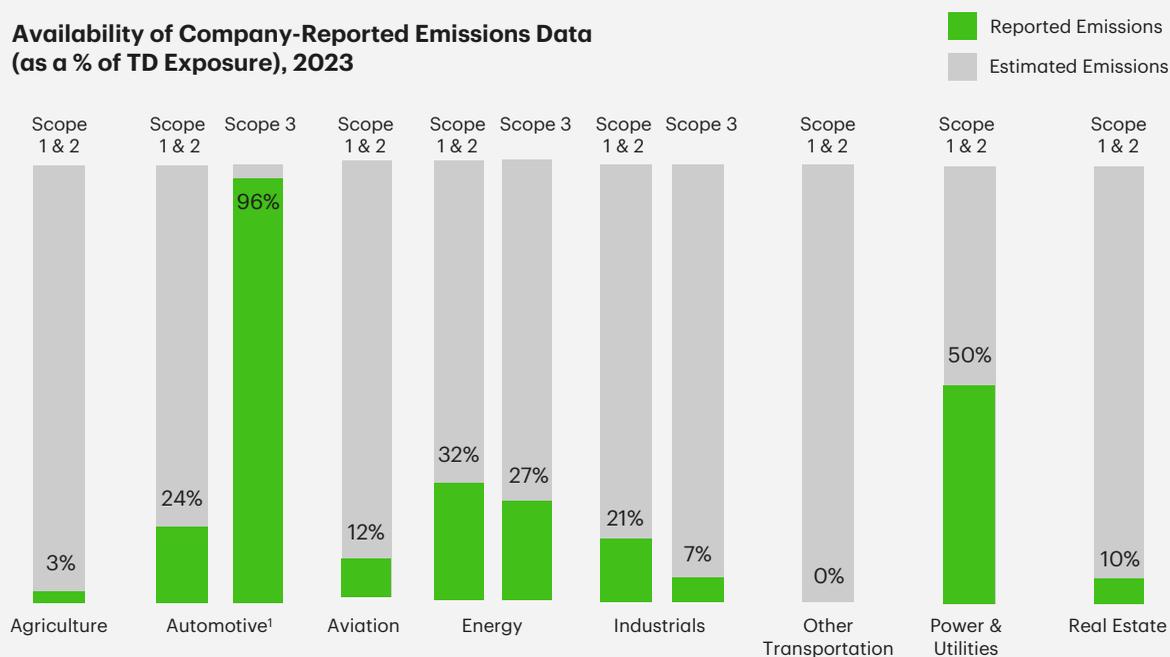


Adapt continued

Data Quality

- In accordance with PCAF guidance, data quality scores are reported for each sector and asset class on a scale of 1 to 5, with 1 being the highest-quality data (e.g., reported and audited emissions data) and 5 relying on estimation methodologies (e.g., economic intensity factors).⁵⁵
- In most non-retail sectors, company-reported data availability remains low, as can be seen in the chart below. This is an ongoing challenge with the financed emissions metric, so we use emission factors to calculate our estimates. In general, larger public companies report their emissions more than smaller public companies and private companies. We also observed better data quality for Scope 1 and 2 emissions compared to Scope 3 emissions, as Scope 3 emissions are reported by fewer companies (with the exception of the Automotive sector).

Availability of Company-Reported Emissions Data (as a % of TD Exposure), 2023



¹ The scope 3 financed emissions footprint for the Automotive sector is limited to downstream emissions from light-duty vehicle manufacturers (LDV OEMs) due to data availability and quality constraints. As a result, Scope 3 emissions estimates are based on a higher share of company-reported data as compared to other sectors, as public emissions disclosures are more readily available for LDV OEMs.

Case Study: Climative White Paper

In our 2022 Climate Action Plan, we published our footprint for the Residential Mortgage sector for the first time, including our data quality score of 5, which is the lowest score per PCAF’s methodology. In subsequent years, as we enhanced our collateral data through additional efforts – including the incorporation of additional building-level square footage information where available – the data quality score improved to 4.3.

We also began preparing internal data for a pilot with Climative, a clean technology company. In 2025, we worked with Climative to demonstrate that its Automated Climate Model (ACM) aligns with PCAF methodologies for a data quality score of 3. The resulting analysis was published in a [white paper](#), with the following highlights:

- Accuracy against EnerGuide audits:** The model’s machine learning estimates align closely with over 600,000 historical on-site energy audits, showing minimal bias (no systematic error at the portfolio level), validating its use for carbon reporting.
- Aligned with the Canadian regulatory landscape:** The model supports compliance with evolving Canadian reporting frameworks and standards such as OSFI B-15.
- Decarbonization roadmap support:** The model identifies high-impact retrofit opportunities and tracks emissions reductions at the property level.

During this pilot, we also completed a feasibility analysis for achieving a data quality score of 3 for TD’s Residential Mortgage portfolio in British Columbia. We concluded that Climative’s ACM could significantly improve the Bank’s data accuracy and, in turn, our data quality scores.

Adapt continued

Targets

The 2030 interim financed emissions targets encompass the majority of the financed emissions attributed to the Bank. These targets, based on GHG emissions reduction pathways from the IEA NZE scenarios, represent the sector's abatement potential within a series of social and economic assumptions such as technology commercialization, consumer behaviour and supportive policy. While actual progress on the latter has not kept pace with pathway assumptions, it is useful to understand the actual emissions trajectory of our clients and the overall sector compared to

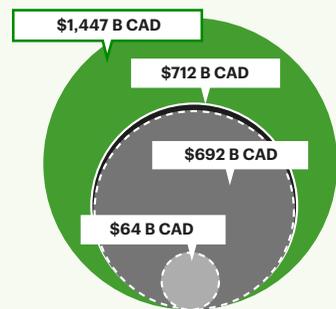
the scenario pathway. Interim (2030) targets were identified for four carbon-intensive⁵⁶ sectors: Energy, Power Generation, Automotive Manufacturing and Aviation. Having established baselines reflecting client emissions in those sectors, we continue to measure and report decarbonization progress against the baseline, and against overall sector progress. We will continue to review our approach to financed emissions targets to align with industry best practice and help drive impact in alignment with our business objectives.

2023 Committed Lending Covered by Financed Emissions Footprint and Targets

This diagram compares TD's 2023 carbon-intensive lending to total lending, and illustrates the portion of lending included in the financed emissions footprint and targets.

Exposures Based on 2023 Committed Lending

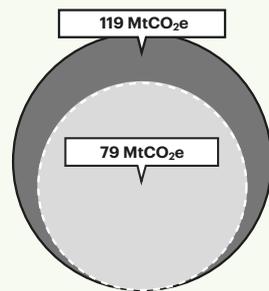
- **TD's Total Lending – \$1,447 B CAD**
Carbon-Intensive and Non-Carbon-Intensive Sectors/Asset Classes



- **Total lending exposures to carbon-intensive sectors¹ – \$712 B CAD** (represents 49% of TD's total lending)
- **TD's lending in scope of TD's financed emissions footprint disclosures¹ – \$692 B CAD** (represents 97% of TD's total lending to carbon-intensive sectors/asset classes)
- **TD's lending in scope of four interim financed emissions targets – \$64 B CAD** (represents 9% of TD's total lending to carbon-intensive sectors/asset classes)

Emissions Based on 2023 Committed Lending

- **TD's financed emissions footprint disclosures (retail and non-retail lending combined) – 119 MtCO₂e**



- **TD's financed emissions in scope of four interim financed emissions targets² – 79 MtCO₂e** (Represents 66% of our financed emissions)

¹ TD's total lending to carbon-intensive sectors includes lending to sectors defined as carbon-intensive by industry guidance, as well as the chemicals sector, which TD considers to also be carbon-intensive. TD's lending in scope of TD's financed emissions footprint disclosures includes only sectors defined as carbon-intensive by industry guidance.

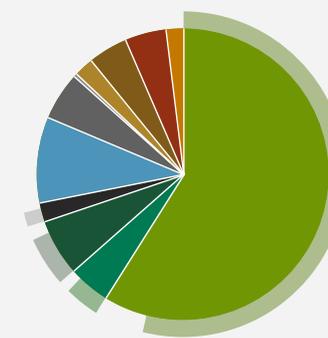
² To calculate the financed emissions associated with total committed lending exposures covered by the targets, the financed emissions of clients in scope for the targets are compared to the total financed emissions.

Percentage of Financed Emissions Covered by Interim Targets¹

This graph shows the percentage of financed emissions in scope of the interim financed emissions targets for the Energy, Power Generation, Automotive Manufacturing and Aviation sectors.

Percentage of Financed Emissions in Scope of Target (Outer Circle)

Energy	
Total Coverage:	93%
Covered Emissions	66.5 MtCO₂e
Scopes 1–3:	71.8 MtCO₂e
Power Generation	
Total Coverage:	82%
Covered Emissions	4.5 MtCO₂e
Scopes 1–3:	5.5 MtCO₂e
Automotive Manufacturing	
Total Coverage:	82%
Covered Emissions	6.3 MtCO₂e
Scopes 1–3:	7.7 MtCO₂e
Aviation	
Total Coverage:	78 %
Covered Emissions	1.9 MtCO₂e
Scopes 1–3:	2.5 MtCO₂e



Financed Emissions by Sector (Inner Circle)

71.8 MtCO₂e	Energy	0.4 MtCO₂e	Other Transportation
5.5 MtCO₂e	Power ²	2.7 MtCO₂e	Real Estate
7.7 MtCO₂e	Automotive	5.3 MtCO₂e	Utilities ²
2.5 MtCO₂e	Aviation	5.5 MtCO₂e	Consumer Auto Loans
11.6 MtCO₂e	Agriculture	2.2 MtCO₂e	Residential Mortgages
6.6 MtCO₂e	Industrials		

¹ The financed emissions footprint reflects 100% of TD's business lending, as well as investments related to carbon-intensive sectors. The interim financed emissions targets reflect TD's business lending and capital markets activity. For more information, see [Footprint Versus Targets](#).

² The financed emissions footprint includes all exposures for the Power and Utilities sector, which are reflected separately in the inner circle. For the coverage assessment of the Power Generation sector, we have only included exposures from Power, as those exposures are more representative of the scope of our Power Generation Target. Utilities sector exposures include gas, water, and waste utilities, which are not in scope of our Power Generation Target.



Adapt continued

Interim Financed Emissions Targets – Approach and Progress^{1,2}

2030 Targets	Energy	Power Generation	Automotive Manufacturing	Aviation
Scope of Client Emissions	Scopes 1, 2 and 3	Scope 1	Scopes 1, 2 and 3	Scope 1 and Scope 3 of Lessors
2030 Emissions Intensity Target ³	1,756	156	91	80
	-29%	-59%	-50%	-10%
Target Metric – Financed Emissions Lending Intensity (FELI) or Physical Emissions Intensity (PEI) ⁴	FELI (gCO ₂ e/\$)	PEI (kgCO ₂ e/MWh)	PEI (gCO ₂ e/vkm)	PEI (gCO ₂ e/pkm)
2019 Emissions Intensity Baseline	2,473	382	181	88
2022 Emissions Intensity	1,896	349	176	88
YoY Impact of EVIC Fluctuations	67	0	0	0
YoY Impact of Portfolio and Client Emission Changes	-110	-6	-6	-2
2023 Emissions Intensity	1,853	342	170	86
2019–2023 Emissions Intensity % Change	-25%	-10%	-6%	-3%
Reference Scenario ⁵	IEA NZE (2021)	IEA NZE (2021)	IEA NZE (2022)	IEA NZE (2022)
Sub-Sectors Included	Coal, Oil and Gas – Upstream, Midstream, Downstream, Integrated	Electricity Generation	Original Equipment Manufacturers of Light-Duty Vehicles	Aircraft Owners and Operators – passenger airlines, including leased aircraft
Contraction/Convergence Approach ⁶	Contraction Approach – TD set a target to contract our FELI by 29%, which aligns to the contraction of the emissions for the Energy sector in the IEA’s NZE Scenario. Restating the 2019 FELI baseline will result in changes to the 2030 emissions intensity target expressed as gCO ₂ e/\$.	Convergence Approach – TD set a target to converge to the actual 2030 level of kgCO ₂ e/MWh for the Power Generation sector as set out in the IEA’s NZE Scenario. Restating the 2019 PEI baseline will result in changes to the 2030 emissions intensity reduction target percentage.	Contraction Approach – TD set a target to contract our PEI by 50%, which aligns to the contraction of the emissions for the Automotive sector in the IEA’s NZE Scenario. Restating the 2019 PEI baseline will result in changes to the 2030 emissions intensity target expressed as gCO ₂ e/vkm.	Convergence Approach – TD set a target to converge to the actual 2030 level of gCO ₂ e/pkm as set out in the IEA’s NZE Scenario. Restating the 2019 PEI baseline will result in changes to the 2030 emissions intensity reduction target percentage.

Updated 2019 Baseline Data

The 2019 baselines for the Energy, Power Generation and Aviation interim financed emissions targets have been restated in line with the TD Environmental Metrics Restatement Guideline. Overall data availability and quality continue to improve as company emissions reporting increases and third-party data providers improve their aggregation and estimation capabilities. For more information, see [Caution Regarding Forward-Looking Statements](#).

Targets were set based on the metric determined to be most appropriate for evaluating decarbonization in each sector.⁵⁷ See [Advancing Our Climate Action Plan: Methodology for TD’s Interim Financed Emissions Targets](#) and pages 46–50 of our [2022 Climate Action Report](#) for details on these metrics and their selection at the time of its publication.

¹ Interim financed emission targets cover the period from 2019 (the baseline year) through to 2030. Due to the lag in GHG emissions reporting, and the two-year lag in financed emissions disclosures, 2030 results will be disclosed in our 2032 disclosures.

² The 2030 interim financed emissions targets include non-retail lending exposures, as well as capital market activities.

³ The 2030 target for the Energy sector has been restated given its updated 2019 baseline. This target is calculated based on a target portfolio contraction percentage (a percentage reduction of 29% below the 2019 baseline). The previous target for the Energy sector was 1,734 gCO₂e/\$.

⁴ For the Energy sector target, gCO₂e/\$ are the grams of carbon dioxide equivalent per Canadian dollar lent/facilitated. For Power Generation, kgCO₂e/MWh are the kilograms of carbon dioxide equivalent per megawatt hour of electricity generated. For Automotive Manufacturing, gCO₂e/vkm are the grams of carbon dioxide equivalent per vehicle kilometre driven. For Aviation, gCO₂e/pkm are the grams of carbon dioxide equivalent per passenger kilometre travelled in a plane.

⁵ The most current IEA reference scenarios available at the time were used in the development of each target.

⁶ Under the Contraction approach, TD’s 2030 interim financed emissions target is set by reducing our emissions by the same proportion or percentage that the sector is required to reduce its emissions by 2030 according to the IEA NZE Scenario. Under the Convergence approach, TD’s 2030 interim financed emissions target is set to align with the projected emissions intensity level for the sector in 2030 according to the IEA NZE Scenario.

For more information on our footprint and target approach, see [Footprint Versus Targets](#).



Adapt continued

Energy Target

North American oil production increased by 7% year over year (versus 2022) and North American gas production increased by 4% year over year,⁵⁸ as companies work to ensure steady and secure energy supply to meet demand,⁵⁹ reflecting the broader geopolitical context.

Similar to previous years, we recognize the impact that fluctuations in company valuations (i.e., EVIC) can have on estimated results. Financed emissions are based on the ratio of client financing to the client's EVIC. In 2023, TD's financing to clients in scope of the Energy target remained relatively flat, with a small increase. Client EVIC values decreased despite increased production, contributing to an increase in Energy FELI. However, this increase was offset by shifts in portfolio financing to lower-intensity clients and decreases in client emissions.

The interim (2030) financed emissions target for the Energy sector is a 29% reduction in FELI (grams of CO₂e per Canadian dollar lent/facilitated) from a 2019 baseline (TD uses the IEA's 2021 NZE Scenario). In the most recent results (2023), FELI decreased 2% from 2022, representing a 25% cumulative reduction from the 2019 baseline.

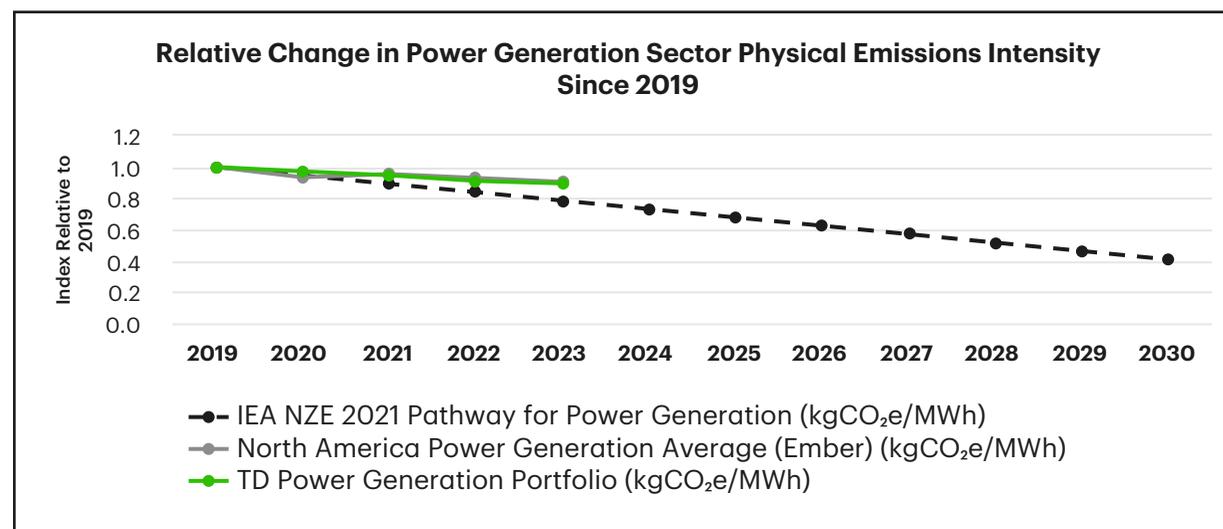
Power Generation Target

While renewable electricity generated in North America declined by 3% in 2023,⁶⁰ the proportion of renewable power generation clients in our portfolio increased. The 2030 interim financed emissions target for the Power Generation sector is a 59% reduction in PEI (kilograms CO₂e per megawatt hour of power produced) from a 2019 baseline (TD uses the IEA's 2021 NZE Scenario). Since 2019, progress against the Power Generation target is largely attributed to growth in the average share of renewable in total power generation for our clients with available production data.

In the most recent results (2023), PEI decreased 2% from 2022, representing a 10% cumulative reduction from the 2019 baseline. However, the pace of progress towards the 2030 target reflects slower than anticipated decarbonization in the North American power market. We will continue to review our approach to financed emissions targets, including the Power Generation target, to align with industry best practice and help drive impact in alignment with our business objectives.

Industry Comparison: TD Power Generation Portfolio^{1,2,3,4,5}

The graph below aims to provide a directional comparison of TD's Power portfolio performance against the broader Power sector in North America, as well as the IEA NZE 2021 emissions reduction pathway for Power Generation. It shows that TD's portfolio performance is trending in line with the broader North American industry, although both are trending higher than the IEA emissions pathway, indicating a slower pace of decarbonization in the broader sector. We will continue to support our clients' efforts to decarbonize in line with industry pathways.



1 This graph should be used as a directional visualization of performance only. The graph includes physical emissions intensity estimates derived from different data sources with different boundaries, as explained below.

2 Values have been indexed to 100% to visualize and compare the values on a consistent basis.

3 The boundaries of the values are different: North American data includes all sub-sectors in the Power sector based on available data. TD's performance and target are restricted to the Power Generation sub-sector, including clients that generate some electricity and also transmit or distribute electricity.

4 TD uses S&P TruCost data for target progress estimations.

5 Ember. 2025. The Energy Institute Statistical Review of World Energy. [online] Available at: <https://www.energyinst.org/statistical-review>.



Adapt continued

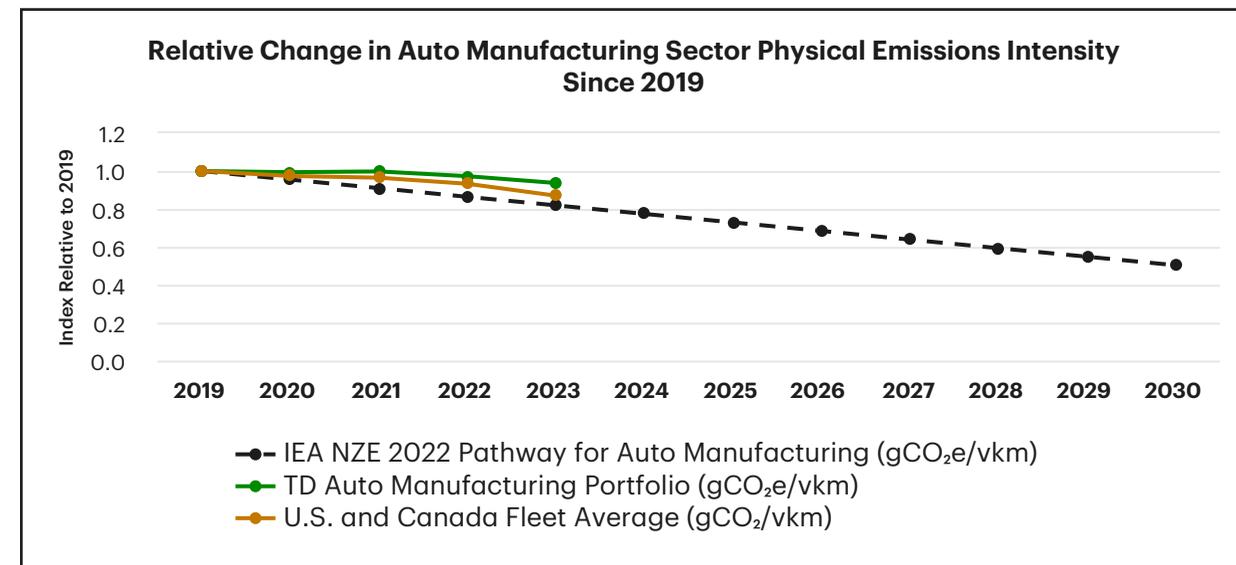
Automotive Manufacturing Target

Global sales of EVs rose by 35% in 2023, driven by strong growth in sales in China, Europe and the U.S.⁶¹ The IEA’s latest EV outlook shows that the global EV fleet will grow fourfold between 2024 and 2030, reaching 250 million vehicles by 2030. While our clients’ production continues to shift towards EVs, there is also growth in less efficient vehicles such as sport utility vehicles (SUVs), impacting clients’ PEI. This correlates with industry trends of a 3% year-over-year growth in SUV sales as a percentage of global car sales in 2023.⁶²

The interim (2030) financed emissions target for the Automotive Manufacturing sector is a 50% reduction in PEI (grams CO₂e per vehicle kilometre travelled of our clients’ light-duty vehicle fleets) from a 2019 baseline. In the most recent results (2023), PEI decreased 4% from 2022, a cumulative 6% reduction from the 2019 baseline. Progress towards this target is impacted by slower than anticipated adoption of electric vehicles in North America. We will continue to review our approach to financed emissions targets, including the Automotive Manufacturing target, to align with industry best practice and help drive impact in alignment with our business objectives.

Industry Comparison: TD Automotive Manufacturing Portfolio^{1,2,3,4,5,6,7,8}

The graph on the right aims to provide a directional comparison of TD’s Automotive portfolio performance against the broader Automotive sector in the U.S. and Canada, using intensity data from the U.S. Environmental Protection Agency (EPA) and Natural Resources Canada (NRCan), as well as against the IEA NZE 2022 emissions reduction pathway for Automotive Manufacturing. The graph shows that the North American average intensity reduction is trending above the IEA NZE pathway, with TD’s portfolio intensity not performing as well as the broader sector in Canada and the U.S. TD’s portfolio’s performance is primarily due to TD’s scope of financing exposures in the Automotive sector, which skews toward manufacturers with a greater proportion of higher intensity vehicles, such as sport utility vehicles (SUVs). We are investigating this further, and the resulting increase in TD’s physical emissions intensity in the sector. We have also engaged with some of our Automotive Manufacturing clients to gain a better understanding of their activities and plans to decarbonize.



1 This graph should be used as a directional visualization of performance only. The graph includes physical emissions intensity estimates derived from different data sources that may have different methodologies for calculation.

2 Values have been indexed to 100% to visualize and compare the values on a consistent basis.

3 The physical emission intensity value of the "U.S., Canada Fleet" was calculated by taking an average of Canada and the U.S.'s emission intensities weighted by their light duty vehicle registrations for each year.

4 TD uses S&P TruCost data for target progress estimations.

5 Environment and Climate Change Canada. 2024. Greenhouse Gas Emissions Performance for the 2023 Model Year Light-Duty Vehicle Fleet. Canadian Environmental Protection Act Registry. [online] Available at: <https://www.canada.ca/en/environment-climate-change/services/canadian-environmental-protection-act-registry/publications/greenhouse-gas-emissions-performance-model-year-2023.html>.

6 United States Environmental Protection Agency. January 15, 2025. 50 Years of EPA's Automotive Trends Report. [online] Available at: <https://www.epa.gov/greenvehicles/50-years-epas-automotive-trends-report>.

7 Statistics Canada. October 17, 2025. Vehicle registrations, by type of vehicle and fuel type. [online] Available at: <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=2310030801>.

8 United States Office of Highway Policy Information. November 2024. State Motor Vehicle Registrations. [online] Available at: <https://www.fhwa.dot.gov/policyinformation/statistics/2023/vm1.cfm>.



Adapt continued

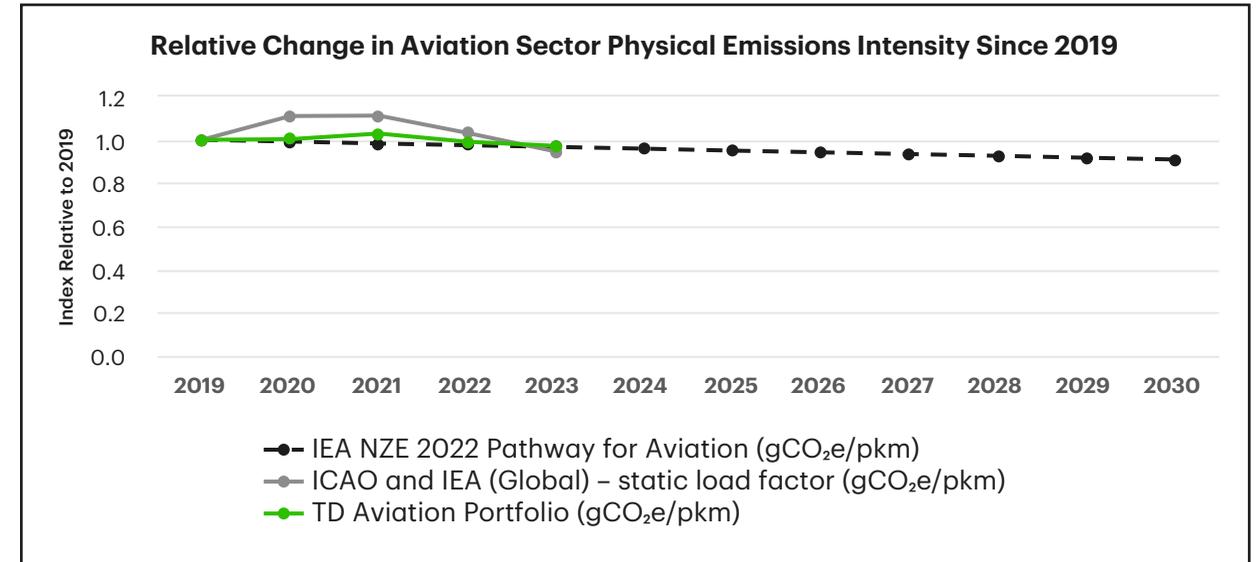
Aviation Target

The International Civil Aviation Organization estimated that over 4.3 billion passengers were carried on scheduled flights in 2023 globally, a 32% increase from 2022,⁶³ as air travel continues to increase toward pre-pandemic levels (estimated 4.5 billion passengers in 2019).⁶⁴

The interim (2030) financed emissions target for the Aviation sector is a 10% reduction in the PEI (grams CO₂e per passenger kilometre travelled) from a 2019 baseline (TD uses the IEA’s 2022 NZE Scenario). The most recent results (2023) for TD’s Aviation portfolio of clients show a decrease of 2% in PEI from 2022 and a cumulative 3% reduction from the 2019 baseline. Passenger load factors⁶⁵ (the percentage of seats filled by passengers) are a significant factor in the PEI calculation. To maintain comparability and reduce volatility in year-over-year PEI results stemming from declines in load factors during the COVID-19 pandemic, we chose to keep load factors constant at 2019 international levels of 82%.⁶⁶

Industry Comparison: TD Aviation Portfolio^{1,2,3,4,5,6}

The graph on the right aims to provide a directional comparison of TD’s Aviation portfolio performance against the broader global Aviation sector, using data from the International Civil Aviation Organization (ICAO) and the IEA. The graph shows that TD’s portfolio performance has been performing well in comparison to global averages, as well as the IEA emissions pathway for Aviation. Moving forward, we expect slower decarbonization progress, as Aviation is a hard-to-abate sector and continues to face challenges with available levers such as the adoption of sustainable aviation fuel. We will continue to support our clients’ efforts to decarbonize in line with industry pathways.



1 This graph should be used as a directional visualization of performance only. The graph includes physical emission intensity estimates derived from different data sources that may have different methodologies for calculation.

2 Values have been indexed to 100% to visualize and compare the values on a consistent basis.

3 As with our progress estimations for our Aviation target, to normalize or adjust the impacts of the COVID-19 pandemic, we have kept a constant load factor since 2019 (load factor being the percentage of seats on a plane filled by passengers).

4 TD uses S&P TruCost data for target progress estimations.

5 Based on passenger kilometres travelled from ICAO. Source: International Civil Aviation Organization. 2023. Presentation of 2023 Air Transport Statistical Results. [online] Available at: https://www.icao.int/sites/default/files/environmental-protection/Documents/ARC_2023_Tables_final.pdf.

6 Based on emissions levels from the IEA WEO 2025 report with an adjustment to remove dedicated freight activity. Source: International Energy Agency. November 12, 2025. World Energy Outlook 2025. [online] Available at: <https://www.iea.org/reports/world-energy-outlook-2025>. Additional Source: The International Council on Clean Transportation. October 2020. CO₂ Emissions From Commercial Aviation: 2013, 2018, and 2019. [online] Available at: <https://theicct.org/wp-content/uploads/2021/06/CO2-commercial-aviation-oct2020.pdf>.

Adapt continued

Challenges

While we continue to make progress on the measurement and management of the financed emissions attributed to TD, there are a number of industry-wide challenges.

Data Volatility, Availability and Quality

The following data challenges occur in some sectors, reducing data quality and limiting the utility of target-setting. We have used our judgment, informed by industry guidance and practices, to develop our approaches and report on our progress.

- **Data volatility:** EVIC is a key component of the absolute financed emissions calculation. It is based, in part, on stock market activity and companies' market capitalizations, and therefore fluctuates with the market, causing synthetic volatility in financed emissions measurements. During periods of market volatility, EVIC can overshadow changes in real-world GHG emission levels, leading to false signals of progress on financed emissions. This reflects a challenge that banks face when relying on financed emissions as a measure of client decarbonization. A potential solution for this challenge is supplementing with additional metrics.

- **External data availability and quality:** While expectations for disclosures increase, lack of reported data is still a reality in some sectors. In these cases, emission factors and averages are used in accordance with PCAF guidance, resulting in low data quality scores since these estimates may not accurately reflect the real-world GHG emissions of our clients.
- **Internal data availability and quality:** For the Real Estate sector, we continue to face challenges with mining the relevant collateral data required by PCAF to calculate emissions. This internal data challenge has limited our ability to accurately estimate financed emissions for the sector. We are working to address this data gap to enhance the accuracy of reporting.

For information on how we are working to address these challenges, see [External Engagement](#).



External Landscape

While there is progress in decarbonizing parts of the economy, it is occurring at a slower pace than needed to limit warming to 1.5°C.⁶⁷ This is reflected in the financed emissions attributed to the Bank, as well as broader decarbonization trends in the real economy when compared to IEA NZE emission reduction pathways.

Achieving the necessary emissions reductions by 2050 will require changes across the broader economy. This includes shifts in government policy, such as changes to clean energy incentives and electric vehicle mandates, that encourage investment in innovative technology and solutions that support decarbonization. Shifts in consumer habits and consumption are also not advancing at the pace required, impacting decarbonization progress in some sectors. We plan to review these targets, as well as additional metrics, to better reflect the progress of the Bank and our clients.



Adapt continued

Transition Readiness

Since 2023, TD has developed and refined its Transition Readiness Assessment (TRA) framework as a portfolio-level analytical tool to inform the Bank's assessment of transition-related risks and opportunities by understanding the preparedness of our portfolio of clients⁶⁸ for transitioning to lower-carbon operations.

The TRA organizes information on transition-related activities using publicly available information and client-provided disclosures across three pillars:

1. GHG emissions profile and disclosure, including Scope 1, 2, and Scope 3 emissions where available.
2. Transition-related commitments and targets, including stated emissions-reduction ambitions and observable changes in absolute emissions or emissions intensity over time.
3. Governance and climate risk management practices, including climate governance structures, climate risk management approaches, scenario analysis and the integration of climate considerations into management incentives.

This information allows for an assessment of portfolio composition by proportion of clients in: Early Stage of Transition, Beginning to Transition, Progressing in Transition and Advanced in Transition. These categories do not represent expectations, requirements or determinations regarding individual clients' transition pathways, nor do they prescribe specific actions or timelines.

In developing this approach, TD leveraged evolving industry practices and applied professional judgment, recognizing that there is currently no standardized or universally accepted methodology for assessing transition readiness. TD expects this analytical framework to continue to evolve over time as data availability improves, sector practices mature and external standards and industry best practices develop.

2025 Enhancements: What Changed and Why it Matters

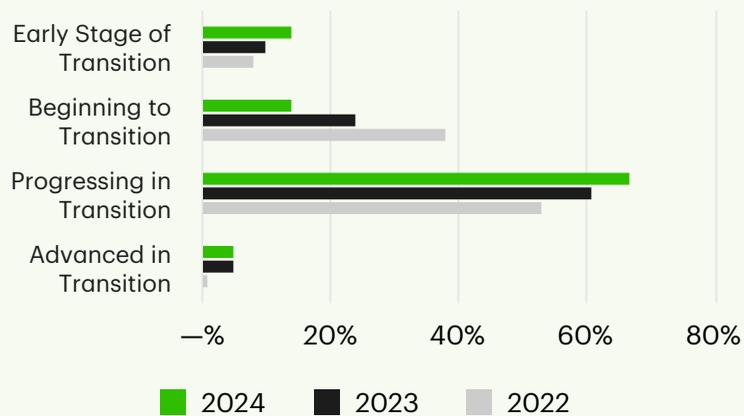
In 2025, TD strengthened its TRA framework to improve efficiency, expand client coverage and deepen climate risk insights. Enhancements include:

- **Automated Data Collection and Scoring:** We transitioned from manual data collection during client engagements to an automated process that leverages an external data provider. This shift reduced processing time, improved consistency across assessments and expanded client coverage.⁶⁹ Since automation enables a more repeatable and scalable annual evaluation process, relationship managers can focus on targeted engagements with clients in the Early and Beginning readiness bands. As third-party yearly data is updated during the first quarter of the following year, we report on a one-year lag to ensure our transition readiness assessments are based on complete data sets.
- **Enhanced Governance Scoring with Climate Risk and Scenario Analysis:** We strengthened the governance component of the TRA by incorporating criteria that assess a client's climate risk identification, assessment and response processes. We also evaluate whether scenario analysis is used to understand the potential impacts of climate change on business strategy and financial performance across different time horizons. These enhancements improve our ability to identify vulnerabilities and prioritize advisory efforts where they are most needed – protecting our portfolio and supporting our clients' long-term success.
- **Oversight and Methodology Evolution:** The TRA undergoes periodic methodology reviews. While data limitations persist – particularly for private and non-reporting companies – the TRA provides insights that are best interpreted alongside qualitative engagement (see the [Client Engagement](#) section). We continue to refine our approach as external standards, industry practices and data sources evolve.



Adapt continued

2025 Energy Sector Transition Readiness (exposure weighted)⁷⁰

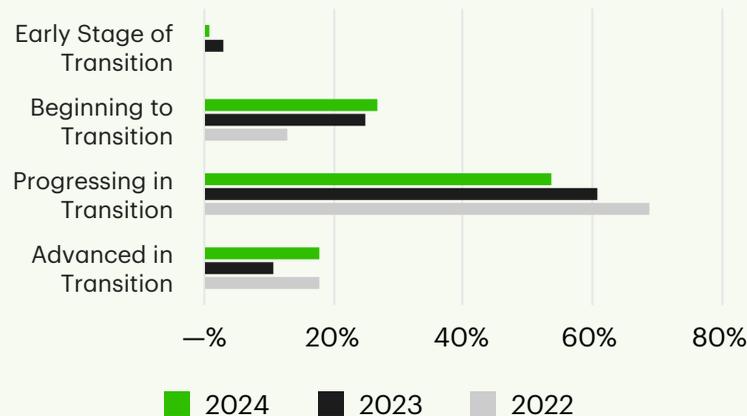


This graph shows that a small but growing share of TD’s exposure in the Energy sector is in the Early Stage of Transition category, suggesting increased exposure to private or smaller non-reporting companies in the Bank’s portfolio.

We also observed a shift in clients’ transition readiness from the Beginning to Transition to Progressing in Transition categories, reflecting positive year-over-year progress. The majority of TD’s portfolio falls into the Progressing in Transition category, indicating sustained advancement across a large group of clients.

TD’s exposure to clients in the Advanced in Transition category has plateaued year over year, indicating that shifting to this state remains challenging and may require larger, more costly, or harder-to-achieve initiatives (e.g., deep decarbonization or capital-intensive retrofits).

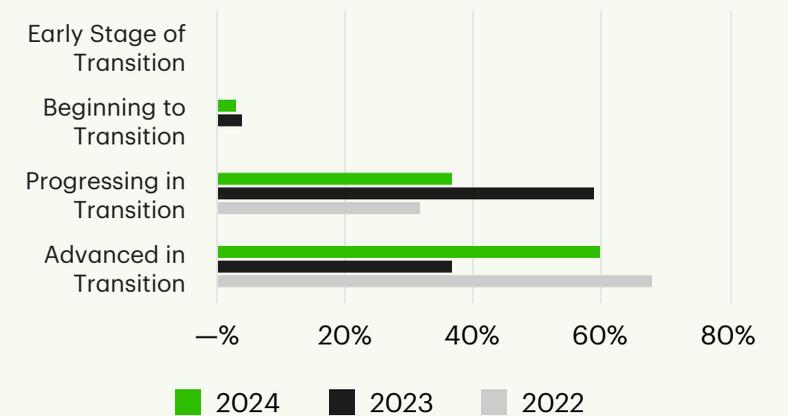
2025 Power Generation Sector Transition Readiness (exposure weighted)⁷¹



This graph shows that the share of TD’s Power Generation portfolio in the Beginning to Transition category has grown substantially between 2022 and 2024. In addition, while TD’s portfolio consists of clients who are Progressing in Transition, the category has declined year over year as some clients have been recategorized to Beginning to Transition. The redistribution from Progressing in Transition to Beginning to Transition from 2022 to 2024 is largely explained by incremental requirements and expectations from the market for credible interim targets and governance, resulting in lower evaluation scores for these topics (e.g., in 2023, Scope 2 and 3 targets and legal and technology risk considerations were introduced into the scoring criteria).

TD’s exposure to clients in the Advanced in Transition category decreased in 2023 and then recovered in 2024. This indicates that clients in the same sector may not advance their transition maturity uniformly, and clients at different stages of transition readiness face different challenges.

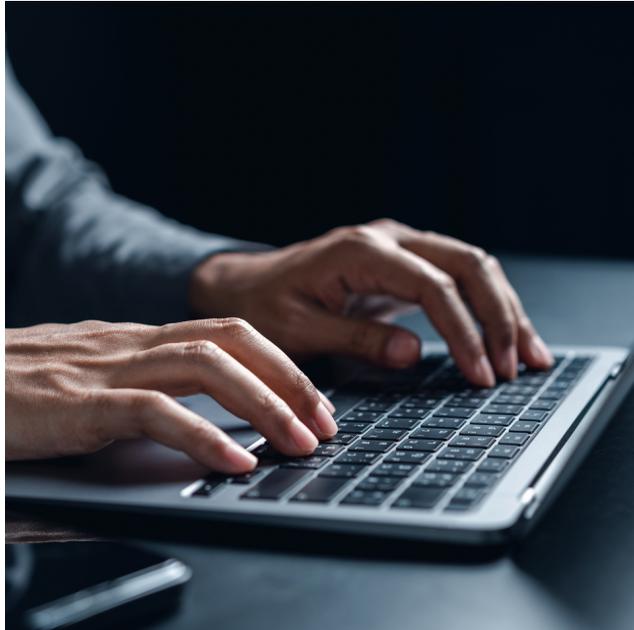
2025 Transportation Sector Transition Readiness (exposure weighted)⁷²



This graph shows that TD’s Transportation portfolio primarily includes clients in Progressing in Transition and Advanced in Transition stages, with notable fluctuations year over year. While most clients have matured in transition readiness, some clients were recategorized from Advanced in Transition to Progressing in Transition in 2023. This was due to heightened external expectations that year related to clients’ commitments and their respective progress, which is reflected in our scoring criteria. As clients adapted to these heightened expectations, several of TD’s clients were recategorized to Advanced in Transition in 2024.



Adapt continued



Data, Technology and Analytics

We continue to invest in data, technology and analytics to strengthen our climate-related measurement and reporting capabilities and adapt to changing market conditions.

Climate Data Solution

In 2025, we continued to invest in new technology, building on last year's progress. Our Climate Data Solution consolidates information from inside our businesses and outside sources, helping us track our environmental metrics more accurately, using trusted standards for data quality. Building a strong

foundational technology solution will enable us to broaden applications and scale its usage across the enterprise.

Climate Scenario Analysis Framework

We continued to integrate vendor models and develop approaches for our internal climate scenario analysis program, including current and forward-looking physical climate risk data and property damage estimates, as well as financial impact estimates under different climate transition scenarios. In 2025, the Bank's focus was on physical risk in real estate (RESL and CRE portfolios), as well as incorporating lessons from the Standardized Climate Scenario Exercise (SCSE) in our understanding of transition risk.

E&S Hub

In 2025, ESG Risk Management launched an E&S Hub to centralize the applicable environmental and social risk assessments for non-retail lending transactions on a cloud-based platform. The E&S Hub streamlines workflow, enhances data tracking and reporting, and improves user experiences.

Third-Party Risk Management Program

In 2025, we made enhancements to our third-party risk management program to more fully integrate E&S risk considerations from third-party suppliers. This allows the Bank to identify, assess, monitor and prioritize risks represented by third parties.

External Engagement

Industry and Government

In 2025, the pace and scope of activity in the standard-setting, regulatory and government landscapes related to climate change continued to evolve. Our engagement with standard-setters, regulators, government and industry helps us stay informed of, and in some cases helps to shape, policy shifts, emerging requirements, upcoming trends and best practices related to climate change. This positions the Bank to adapt our capabilities to the evolving landscape, and support the long-term resilience of the financial system.

Key Highlights in 2025

- Through the Canadian Bankers Association (CBA), TD participated in the consultation for the International Sustainability Standards Board (ISSB) Exposure Draft: Amendments to Greenhouse Gas (GHG) Emissions Disclosures – Proposed Amendments to IFRS S2, which aims to support entities applying specific GHG emissions disclosure requirements in IFRS S2, particularly during the implementation phase.
- TD became a participating member of the newly formed CBA Climate Policy Steering Group, established in 2025 to address climate policy issues in Canada that intersect with banking.
- We participated in various working groups to help advance financed emissions calculations in sectors where significant data gaps exist, including the development of Canada-specific emission factors for the Agriculture sector.
- TD Insurance helped form a working group with Canadian United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Sustainable Insurance (PSI) signatories to develop a standard methodology to calculate GHG emissions associated with insurance claims. This work aims to support comparable and consistent GHG reporting within the Canadian insurance industry as regulatory requirements come into effect.



Adapt continued

Engagement with Industry-led Groups and the Public Sector

We continue to engage with many industry groups and public sector organizations on climate change. Below are some examples of our engagements in 2025.

Engagement Examples: TD Bank Group

Group	Engagement
GHG Emissions Accounting and Target-Setting	
Partnership for Carbon Accounting Financials (PCAF)	PCAF is an industry-led group working to develop shared standards for measuring and disclosing GHG emissions associated with financing activities. TD is a member of the industry-wide PCAF working group and participates in education and discussion sessions regarding carbon accounting and financed emissions calculations. Through its membership, the Bank promotes consistency and harmonized approaches to data, metrics and methodologies.
Risk Management	
United Nations Environment Programme Finance Initiative (UNEP FI)	TD is a member of UNEP FI, a UN-convened network of banks, insurers and investors working to accelerate sustainable development. TD participates in a variety of working groups and initiatives focused on decarbonization, climate risk management and related disclosures for financial institutions.
Sustainable Finance	
Institute for Sustainable Finance (ISF)	ISF is a network comprised of academia, the private sector and government working to advance research and innovation in sustainable finance. TD is a founding contributor and participant of ISF, which was established in November 2020.
Industry Engagement	
Canadian Bankers Association (CBA)	TD is a member of the CBA, a national association representing banks operating in Canada. TD participates in public consultations and engagement initiatives with the CBA on a variety of topics, including proposed guidance for the assessment and management of climate risks and opportunities, and disclosure frameworks developed by regulators, standard-setters and industry groups.
Institute for International Finance (IIF)	TD is a participating member of the IIF, a global association of the financial industry, with about 400 members from more than 60 countries. The IIF develops engagement positions on behalf of its global membership and manages official sector engagements, including engagement on sustainability topics. It hosts discussion forums about ESG (including climate- and nature-related) risk management, disclosure, data and taxonomy.
Disclosure	
CDP's Climate Change Questionnaire	Since 2010, TD has responded to CDP's climate disclosure questionnaire.

Engagement Examples: Lines of Business

Group	Engagement
TD Securities	
International Capital Markets Association (ICMA)	ICMA serves as Secretariat of the Green Bond Principles, the Social Bond Principles, the Sustainability Bond Guidelines and the Sustainability-Linked Bond Principles (collectively, "the ICMA Principles"), providing support and advice related to sustainable debt governance. TD Securities is a member of the ICMA Principles and an active contributor to the Climate Transition Finance Working Group, Green Enabling Projects Task Force and SLL Refinancing Bonds Task Force.
International Emissions Trading Association (IETA)	IETA works alongside governments and stakeholders with the mission of creating a more transparent and credible voluntary carbon market to help drive financing toward initiatives that create emissions reductions and removals. TD is a member of IETA.
TD Asset Management Inc. (TDAM)	
Climate Engagement Canada (CEC)	TDAM is a founding participant of CEC and is represented on CEC's Technical Committee and its Industry Leaders Advisory Panel. CEC is a finance-led initiative that drives dialogue between the financial community and corporate issuers to help support activities of Canadian public companies.
Principles for Responsible Investment (PRI)	PRI is a UN-supported international network of investors working to promote its six Principles of Responsible Investment. TDAM was among the first Canadian bank-owned asset managers to sign the UN-backed PRI in 2008.
TD Insurance	
United Nations Environment Programme Finance Initiative (UNEP FI): Principles for Sustainable Insurance (PSI)	TD Insurance was the second Canadian company to become a signatory to the UNEP FI PSI in 2014, serving as a member of the board. TD Insurance's annual PSI disclosure highlights how the PSI are incorporated into its strategy, operations and risk management.
Climate Proof Canada	TD Insurance is a founding member of Climate Proof Canada, a broad coalition of insurance industry representatives, municipal governments, Indigenous organizations, environmental non-governmental organizations and research organizations. The coalition is encouraging the federal government to prepare for the effects of climate change by building a more disaster-resilient country.



Adapt continued

Thought Leadership

We continue to participate in discussions with governments, industry participants and other stakeholders in support of broader efforts to decarbonize. We demonstrate thought leadership on a wide variety of subjects through publications, podcasts and speaking engagements. In 2025, examples include:

- TD Innovation Partners, in partnership with ArcTern Ventures, hosted The Climate Capital Conversation: From Term Sheet to Impact during the inaugural Toronto Climate Week. The panel focused on what investors and banks look for when backing climate-focused companies, how startups can raise capital with climate impact at the core, and how collaboration among venture capital, banks and founders can accelerate solutions.
- TD Economics published:
 - [Canadians Need to Think Strategically on Electric Vehicles and China](#)
 - [Cradle to Grave: Lifecycle Emissions of Electric Versus Gasoline Vehicles in Canada](#)
 - [Climate Policy in a 2nd Trump Term – What’s on the Chopping Block?](#)
- TD Securities co-hosted a forum at New York Climate Week, convening global leaders to explore actionable strategies for scaling climate finance. TD Securities led key discussions on enabling policies, financing innovation and integrating decarbonization into investment strategies, reinforcing its role in advancing sustainable capital markets.
- TD Cowen, a division of TD Securities, published:
 - [TD Cowen Research Themes](#), an annual publication highlighting investment themes across sectors, including sustainability-related themes such as energy demand and nuclear resurgence.
 - [Sustainability & Energy Transition Primer](#), the 10th annual primer part of its [Ahead of the Curve Series®](#), which assists investors in navigating the sector’s complex and varied sub-verticals.
 - [TD Cowen Insights Podcast](#), with episodes dedicated to energy transition that explore key technologies for decarbonization.
- TDAM published:
 - [The Circular Economy, an Opportunity for Investors](#)
 - [The Role of Critical Minerals in the Energy Transition](#)
- TD Insurance spoke as a panelist at the GLOBExCHANGE on how businesses can prioritize the proper management and restoration of nature while continuing to create value and ensuring supply chain stability.

Community

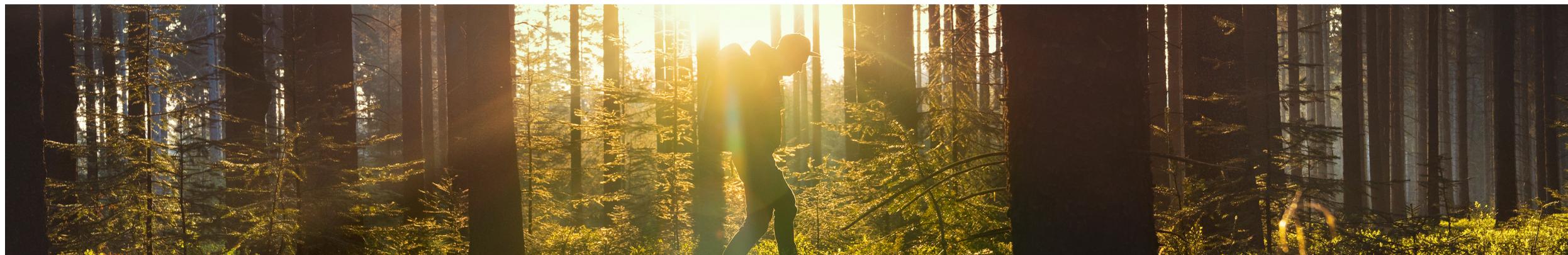
We recognize the importance of supporting workers, businesses and communities impacted by the transition, and helping to ensure that the benefits are shared widely. In 2025, we leveraged our corporate philanthropy to support non-profit organizations helping to create jobs and workplace opportunities. Two of these initiatives focused on re-skilling and upskilling workers in clean technologies, as described below.

Canada: Since December 2022, TD has supported Esplanade Québec’s Environment and Climate Change innovation sector. The accelerator supports entrepreneurs focused on innovative solutions that contribute to Québec’s socio-environmental transition by providing resources, mentorship, coaching, analysis and access to investors and markets. In 2025, TD renewed our support with a commitment of \$390,000 over three years, with a focus on the accelerator’s new “Circular Movement” program, which offers support for entrepreneurs at the commercialization and growth stages, that provide circular economy solutions across four priority sectors: bio-food; textiles; construction/renovation/demolition; and plastics.

United States: With a grant provided by TD in 2024, Vermont Works for Women’s Trailblazers program creates opportunities for individuals to pursue pathways supporting Vermont’s transition efforts. The program provides training in trades such as renewable energy, weatherization and green building. Through one-on-one coaching, participants gain skills in resume building, job searches, interviewing and networking. The program aims to support women at every stage of their career journey, and to improve workplace environments so that more women can have economic stability and contribute to the state’s future. As of fall 2025, the program had benefited 237 individuals and engaged 136 employers.



Grow



Our Sustainability Strategy helps unlock growth opportunities for TD's businesses and clients. For information on our sustainable finance approach, see the [Sustainable Finance](#) section.

Harnessing Climate-Related Opportunities

Climate-related opportunities can arise across the Bank's operations, as well as our business lines. In 2024, TD provided examples of climate-related opportunities, which referenced the Task Force on Climate-related Financial Disclosures (TCFD) categories that encapsulated business opportunities (e.g., products and services, low-carbon markets) and operational opportunities (e.g., adopting low-emission energy sources, energy efficiency). This year, we are evaluating opportunities that are operational, business, or strategic in nature.

Our process for this year has integrated these considerations into the development of sustainability business plans. This allows the Bank to monitor and prioritize climate-related opportunities with oversight by the Enterprise Sustainability Transition Program. Additionally, we continue to develop measurement processes and capabilities aimed at assessing the potential financial impacts of climate-related opportunities, which are housed within our inventory prior to public disclosures.

We may reference relevant climate-related categories in TD's Sustainable & Decarbonization Finance Target (SDFT) when assessing climate-related opportunities. However, business activities quantified in the SDFT should not necessarily be considered climate-related opportunities because they still might undergo our specific assessment and prioritization process. For more information on our SDFT and progress to date, see the [Sustainable Finance](#) section.

Sustainability Business Plans

In 2025, Enterprise Sustainability established a standardized approach for each line of business to identify and assess sustainability risks and business opportunities that help protect and grow the Bank. This approach was designed to align with TD's existing strategic business planning process.

Working groups were established for each line of business, which then developed a sustainability business plan after evaluating current and future business opportunities and risks, and identifying key focus areas aligned to business growth priorities.

Work continues in 2026 to support the execution of each line of business's plan and to explore opportunities to further embed sustainability growth opportunities into the Bank's existing planning cycles.



Grow continued

Products and Services

Across our lines of business, we are working to grow the business of the Bank through products and services that support decarbonization while continuing to meet our clients' evolving needs.

TD Securities

The TD Securities Sustainable Finance & Advisory group provides ESG advisory and financing solutions across Corporate and Investment Banking and Global Markets, collaborating with partners from TD Securities to support the implementation of sustainability and decarbonization strategies in the public and private sectors.

In 2025, TD Securities ranked first among global underwriters for USD sustainable digital infrastructure leveraged loans and second among global underwriters of sustainable asset-backed securities (ABS) for data centre issuers, according to Bloomberg. This includes acting as Sustainability Structuring Agent and/or Joint Bookrunner roles on more than \$7 billion in green securitizations for digital infrastructure clients prioritizing energy efficiency and resource management, attracting sustainability-focused investors and enabling favourable financing terms. For more information, see [Case Study: TD Securities – Advising Digital Infrastructure Clients on Sustainable Financing](#).

TD Securities Principal Investments

We recognize the opportunity to help decarbonization by supporting clean energy solutions, including innovative solutions that present future growth and economic value. Since 2019, TD Securities has made 47 principal investments in venture and growth funds, of which 12 have been cornerstone investments in North American investment managers focused on clean energy.⁷³ These clean energy funds have made investments in over 100 portfolio companies across a wide range of sectors such as carbon technology, clean energy generation, electric transportation and mobility solutions, and industrial decarbonization.

TD Insurance

Extreme weather events continue to have an impact on the communities we serve, and TD Insurance plays an important role in helping clients find the right coverage for their risks. As such, TD Insurance offers products and services that aim to enhance clients' resilience to climate-related risks. Examples include:

- **Wildfire Defense Systems:** In 2025, TD Insurance began working with Wildfire Defense Systems (WDS) to provide property protection services to eligible clients in British Columbia, Alberta and Saskatchewan. WDS is a specialized third-party provider that supports wildfire response efforts by deploying wildfire mitigation techniques, such as clearing debris and moving propane tanks and outdoor furniture away from homes to help protect eligible properties in active wildfire zones.
- **Seasonal Advisory and Weather Alerts:** Through digital channels, TD Insurance provides its clients with proactive communication and targeted advice to mitigate loss and increase the resilience of their homes from wildfire, wind and flood.
- **Mobile Response Units:** TD Insurance's Mobile Response Units provide in-person assistance with claims in areas experiencing catastrophic events and where normal communication channels are impaired.

For more information on the sustainability approaches of our lines of business, see [Sustainable Finance Highlights Across Our Business](#).



Grow continued

TD Asset Management

TD Asset Management Inc. (TDAM) offers a diversified suite of investment solutions to corporations, pension funds, endowments and foundations. In recent years, TDAM has expanded its offering of sustainable investment solutions, which seek to provide a more focused avenue to assist clients with their sustainability-oriented objectives. Examples include:

- **TD Greystone Infrastructure Strategy:** This fund promotes climate change mitigation and occupational health and safety characteristics through its asset management practices.⁷⁴ This includes engagement with the management teams of portfolio companies. The TD Greystone Infrastructure Strategy also assesses the ongoing governance of the investee companies included in its portfolio. As of October 31, 2025, 75% of the strategy is invested in clean energy⁷⁵ across three major platforms: solar (Silicon Ranch Corporation), wind (Rabbalshede Kraft) and battery storage (Enfinite).
- **TD Emerald Low Carbon/Low Volatility Global Equity Pooled Fund Trust:** This fund seeks to build a portfolio of stocks that is less volatile than the broad market, while also mitigating exposure to transition risks from high-carbon-emitting companies. To this end, the fund seeks out stable, high-quality companies with low price volatility that also emit lower levels of carbon emissions per unit of revenue.
- **TD North American Sustainability Bond Fund:** This fund is designed to earn current income by investing primarily in a diversified portfolio of North American fixed income securities, while following a socially responsible approach to investing. Through this fund, investors can gain access to an actively managed fixed income solution that includes investing in bonds that TDAM views as green, social, sustainable, and/or sustainability-linked. Such bond investments will be considered those that have strong sustainability characteristics and/or positively contribute toward the United Nations Sustainable Development Goals (SDGs).⁷⁶ Under this program, if a security is not ESG-labelled, TDAM will only select bond/fixed income investments from issuers with stronger internal ESG ratings. At the end of 2025, over 38% of the fund's assets were invested in green bonds.

Client Engagement

TD's client-centric approach is a key pillar of our strategy. By engaging clients on their sustainability and climate-related goals, we can provide tailored financial solutions – such as green financing and other sustainability-focused products – that support their progress. This approach strengthens TD's role as a trusted advisor in sustainable finance.

The TD Securities Sustainable Finance & Advisory group also directly supports client demand by providing:

- Strategic insights on transition pathways
- Updates on TD's decarbonization progress
- Industry and sector-specific expertise
- Advisory support on decarbonization strategies, if requested by our clients.

TD Securities also participates in broader forums to position TD as a leader in sustainable finance and advisory.

This year, we also refined our methodology for collecting data to better inform our Transition Readiness Assessment (TRA). For more information, see the [Transition Readiness](#) section.



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Appendices



OSFI B-15 Index

The table below details how this report addresses the 2025 disclosure expectations outlined in OSFI’s Guideline B-15: Climate Risk Management Annex 2-2.

OSFI B-15 Disclosure Element	OSFI B-15 Disclosure Expectation	Page Reference
Governance		
a	Describe the governance body(ies) (e.g., board of directors, committee, other) or individual(s) responsible for oversight of climate-related risks and opportunities, including their identity, responsibilities, skills and competencies, process around staying informed, oversight of strategy, major transactions, risk management processes, target setting and monitoring progress towards those targets, and a description of whether and how climate-related considerations are factored into their remuneration.	<p>Description of governance bodies responsible for oversight of climate-related risks and opportunities including their identity, responsibilities, oversight of strategy, major transactions, risk management processes, target setting and monitoring progress towards those targets</p> <ul style="list-style-type: none"> • See the governance chart in Sustainability Governance: page 18 • See Leadership Oversight of Sustainability: page 19 • See Board Members: located externally • See Committees of the Board: located externally • See 2026 Management Proxy Circular: located externally: pages 58–60 <p>Description of skills and competencies and the process around staying informed</p> <ul style="list-style-type: none"> • See Leadership Oversight of Sustainability: page 19 • See 2026 Management Proxy Circular: located externally: pages 46–48, 58–59 <p>Description of whether and how climate-related considerations are factored into executive remuneration</p> <ul style="list-style-type: none"> • See 2026 Management Proxy Circular: located externally: pages 61, 91–92, 99
b	Describe management’s role in monitoring, managing and overseeing climate-related risks and opportunities, including the identity of the management-level position or committee as applicable, its governance processes, controls and procedures, and how oversight is exercised over that position or committee.	<p>Description of management’s role in monitoring, managing and overseeing climate-related risks and opportunities</p> <ul style="list-style-type: none"> • See the governance chart in Sustainability Governance: page 18 • See Groups Responsible for ESG Risk Management at TD: page 19 • See Groups Responsible for Integrating Sustainability Governance and Strategy at TD: page 20 <p>Description of governance over climate-related opportunities inventory</p> <ul style="list-style-type: none"> • See Harnessing Climate-Related Opportunities: page 88



OSFI B-15 Index continued

Strategy	
<p>a</p>	<p>Describe the climate-related risks and opportunities the FRFI has identified that could reasonably be expected to affect its cash flows, access to finance or cost of capital, including:</p> <ul style="list-style-type: none"> The classification of each climate-related risk as either physical or transition risk; The expected timeframe for the occurrence of effects associated with each risk and opportunity (short, medium, or long term); The FRFI's definitions of short term, medium term and long term in relation to strategic decision-making planning horizons. <p>Description of the climate-related risks the FRFI has identified and the classification of each climate-related risk as either physical or transition risk</p> <ul style="list-style-type: none"> See Defining Climate Risk: page 48 See TD's Guide to Climate Risk Identification: pages 50–54 See Heatmaps: pages 55–57 <p>Description of expected timeframe for the occurrence of effects associated with each risk (short, medium, or long term)</p> <ul style="list-style-type: none"> See TD's Guide to Climate Risk Identification: pages 50–54 <p>Description of the climate-related opportunities the FRFI has identified</p> <ul style="list-style-type: none"> See Harnessing Climate-Related Opportunities: page 88 <p>Definitions of short term, medium term and long term in relation to strategic decision-making planning horizons</p> <ul style="list-style-type: none"> See Time Horizons: page 47
<p>b) i</p>	<p>Business model and value chain</p> <p>Describe:</p> <ul style="list-style-type: none"> The current and anticipated effects of climate-related risks and opportunities on the FRFI's business model and value chain; Where in the FRFI's business model and value chain the climate-related risks and opportunities are concentrated. <p>Strategy and decision-making</p> <p>Disclose information about current and anticipated:</p> <ul style="list-style-type: none"> Changes to the FRFI's business model, including its resource allocation, to address climate-related risks and opportunities; Direct mitigation and adaptation efforts; Indirect mitigation and adaptation efforts. <p>Financial position, financial performance, and cash flows</p> <p>Describe:</p> <ul style="list-style-type: none"> How climate-related risks and opportunities have affected the FRFI's financial position, financial performance, and cash flows for the reporting period; How the FRFI expects its financial position, financial performance, and cash flows to change over the short, medium, and long term, given its strategy to manage climate-related risks and opportunities. <p>Description of the effects of climate-related risks and opportunities on the FRFI's business model and value chain</p> <ul style="list-style-type: none"> See TD's Guide to Climate Risk Identification: pages 50–54 See Heatmaps: pages 55–57 See Harnessing Climate-Related Opportunities: page 88 <p>Description of changes to the FRFI's business model to address climate-related risks and opportunities, direct and indirect mitigation and adaptation efforts</p> <ul style="list-style-type: none"> See How TD Manages E&S Risk (including Climate-Related Risk Management Approach): pages 48–49 See TD's Guide to Climate Risk Identification: pages 50–54 See Capital Deployed Towards Climate-Related Risks: page 59 See Harnessing Climate-Related Opportunities: page 88 <p>Description of how climate-related risks and opportunities have affected the FRFI's financial position, financial performance and cash flows for the reporting period, and how the FRFI expects its financial position, financial performance and cash flows to change over the short term</p> <ul style="list-style-type: none"> See Review of Financial Performance, and Operating Environment and Outlook: located externally in the 2025 TD Annual Report (under "Business Segment Analysis – Wealth Management and Insurance" in the Management Discussion and Analysis section): page 52



OSFI B-15 Index continued

Risk Management		
a	Disclose information about the FRFI's processes and related policies for identifying, assessing, prioritizing and monitoring climate-related risks. In meeting this disclosure expectation, the FRFI should explain how it has applied Principle 3 in Chapter 1 of this Guideline.	<p>Information on the FRFI's processes and policies for identifying, assessing, prioritizing and monitoring climate-related risks</p> <ul style="list-style-type: none"> • See Risk Management: pages 12–13 • See How TD Manages E&S Risk (including Climate-Related Risk Management Approach): pages 48–49 • See Identifying and Managing Climate-Related Risks: pages 50–59
b	Disclose information about the FRFI's processes for identifying, assessing, prioritizing and monitoring climate-related opportunities including information about whether and how the FRFI uses climate-related scenario analysis to inform its identification of climate-related opportunities.	<p>Information on the FRFI's processes for identifying, assessing, prioritizing and monitoring climate-related opportunities</p> <ul style="list-style-type: none"> • See Harnessing Climate-Related Opportunities: page 88
c	Disclose information about the extent to which, and how, the FRFI's processes for identifying, assessing, prioritizing and monitoring climate-related risks and opportunities are integrated into and inform the FRFI's overall risk management process.	<p>Information on the FRFI's processes for identifying, assessing, prioritizing and monitoring climate-related risks and opportunities and how they are integrated into and inform the risk management process</p> <ul style="list-style-type: none"> • See Risk Management: pages 12–13 • See How TD Manages E&S Risk (including Climate-Related Risk Management Approach): pages 48–49 • See Identifying and Managing Climate-Related Risks: pages 50–59 • See Scenario Analysis: pages 60–62
Metrics and Targets		
a	Disclose metrics used by the FRFI to assess climate-related risks and opportunities in line with its strategy and risk management process.	<p>Details on metrics used by the FRFI to assess climate-related risks and opportunities aligned to its strategy and risk management process</p> <ul style="list-style-type: none"> • See Sustainable Finance (including Our Approach and Progress Toward Our \$500 billion Sustainable & Decarbonization Finance Target): pages 23–25 • See Heatmaps: pages 55–57 • See Assessing Exposure to Physical Risks: page 58 • See Assessing Exposure to Transition Risks (including Carbon-Related Assets): page 59 • See Operational Emissions Target (Scope 1 and 2 GHG Emissions): page 66 • See Interim Financed Emissions Targets – Approach and Progress: page 78 • See Harnessing Climate-Related Opportunities: page 88



OSFI B-15 Index continued

Metrics and Targets	
<p>b) i</p> <p>Disclose separately the FRFI's Scope 1 and location-based Scope 2 absolute gross GHG emissions for the period.</p> <p>Disclose the measurement approach, inputs and assumptions the FRFI uses to measure its Scope 1 and Scope 2 GHG emissions, and the underlying reasons for these decisions.</p> <p>Disclose the reporting standard used by the FRFI to calculate and disclose GHG emissions. If the reporting standard used by the FRFI is not the GHG Protocol Corporate Standard, disclose how the reporting standard used by the FRFI is comparable.</p>	<p>Details on the FRFI's Scope 1 and location-based Scope 2 absolute gross GHG emissions, including basis of measurement and reporting standard</p> <ul style="list-style-type: none"> • See Scope 1 and 2 GHG Emissions: pages 64–65 • See 2025 Sustainability Performance Data Pack & Indices: located externally (refer to tab “Operational GHG Emissions”)
<p>c</p> <p>Disclose any quantitative and qualitative climate-related targets the FRFI has set to monitor progress towards achieving its strategic goals, including:</p> <ul style="list-style-type: none"> • The objective of the target; • The period over which the target applies; • The base period from which progress is measured; • Any revisions to the target and an explanation of those revisions. 	<p>Details on the FRFI's setting of quantitative and qualitative targets and monitoring progress against strategic goals</p> <ul style="list-style-type: none"> • See Sustainable Finance (including TD Bond Investments): pages 23–24, 28 • See Operational Emissions Target (Scope 1 and 2 GHG Emissions): page 66 • See Interim Financed Emissions Targets – Approach and Progress: page 78 • See TD Sustainable Decarbonization & Finance Target Methodology: located externally: page 1
<p>Disclose information about the FRFI's approach to setting and reviewing each target and how it monitors progress against each target.</p>	<p>Details on the FRFI's approach to setting, reviewing and monitoring progress against each target, as well as governance of targets</p> <ul style="list-style-type: none"> • See Sustainable Finance (including TD Bond Investments): pages 23–24, 28 • See Operational Emissions Target (Scope 1 and 2 GHG Emissions): page 66 • See Interim Financed Emissions Targets – Approach and Progress: page 78 • See External Landscape: Page 82 • See TD Sustainable Decarbonization & Finance Target Methodology: located externally: pages 2–5, 11–14 • See 2026 Management Proxy Circular: located externally: pages 58–59
<p>Disclose information about the FRFI's performance against each climate-related target and an analysis of trends or changes in the FRFI's performance.</p>	<p>Details on the performance against targets and trends and changes in performance</p> <ul style="list-style-type: none"> • See Sustainable Finance (including TD Bond Investments): pages 23–25, 28 • See Operational Emissions Target (Scope 1 and 2 GHG Emissions): pages 66–67 • See Interim Financed Emissions Targets – Approach and Progress: pages 78–82
<p>For any GHG emissions target disclosed (and the corresponding metrics, if applicable), disclose it both gross of, and net of, carbon offsets, if applicable, and explain the type of offset (for example, carbon credit, nature-based, other).</p>	<p>Details on the GHG emissions target, gross and net of carbon offsets</p> <ul style="list-style-type: none"> • See Operational Emissions Target (Scope 1 and 2 GHG Emissions): page 66 • See Carbon Credits: Page 68



OSFI B-15 Index continued

Metrics and Targets

<p>d</p>	<p>Disclose the following cross-industry metrics:</p> <ul style="list-style-type: none"> Climate-related transition risks: the amount and percentage of assets or business activities vulnerable to climate-related transition risks; Climate-related physical risks: the amount and percentage of assets or business activities vulnerable to climate-related physical risks; Climate-related opportunities: the amount and percentage of assets or business activities aligned with climate-related opportunities; Capital deployment: the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities; Internal carbon price: <ul style="list-style-type: none"> An explanation of whether and how the FRFI is applying a carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis); and The price for each metric tonne of GHG emissions the entity uses to assess the costs of its GHG emissions Remuneration: the percentage of senior management and other material risk-takers' remuneration recognized in the current period that is linked to climate-related considerations. (Expected for D-SIBs and IAIGs, only) 	<p>Details on climate-related transition risks</p> <ul style="list-style-type: none"> See Assessing Exposure to Transition Risks (including Carbon-Related Assets): page 59 <p>Details on climate-related physical risks</p> <ul style="list-style-type: none"> See Assessing Exposure to Physical Risks: page 58 <p>Details on climate-related opportunities</p> <ul style="list-style-type: none"> See Harnessing Climate-Related Opportunities: page 88 <p>Details on capital deployment</p> <ul style="list-style-type: none"> See Capital Deployed Towards Climate-Related Risks: page 59 See Harnessing Climate-Related Opportunities: page 88 <p>Details on internal carbon prices</p> <ul style="list-style-type: none"> N/A (TD does not have a shadow price nor an internal tax or fee which is charged to lines of business as a carbon price). <p>Details on remuneration</p> <ul style="list-style-type: none"> See 2026 Management Proxy Circular: located externally: pages 90–92
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Footprint Versus Targets

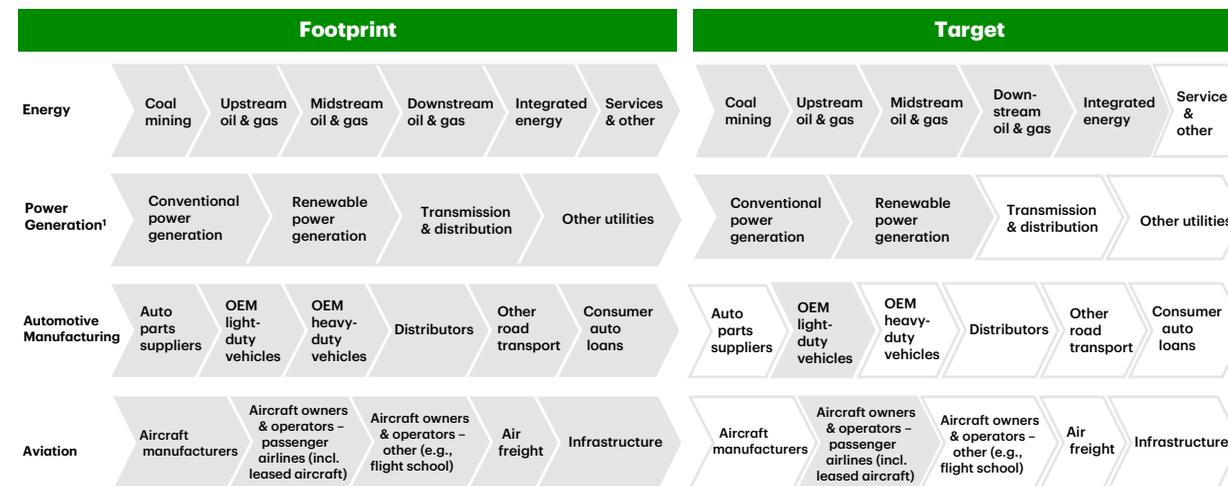
Interim financed emissions targets were set in accordance with industry guidance. Our target-setting approach is broadly consistent with our footprint approach, with three primary differences:

- Financed emissions targets focus on specific parts of a sector’s value chain: While our quantified financed emissions footprint broadly covers emissions from clients in carbon-intensive sectors across all sub-sectors, financed emissions targets focus on specific parts of the value chain that represent most of a sector’s emissions and/or can drive significant knock-on effects across the sector.
- Financed emissions targets are intensity-based, not absolute: Intensity-based metrics quantify financed emissions per unit of output (e.g., CO₂ per megawatt hour) or financed emissions per economic unit (e.g., CO₂ per dollar lent/facilitated). Intensity-based targets allow for and incentivize lower-carbon economic and business growth for the Bank and our clients, in alignment with our strategy of meeting our clients where they are and supporting them in their decarbonization journeys. Intensity-based targets also provide insights that can drive meaningful engagement with clients of different sizes.
- The use of intensity-based metrics enables emissions efficiency comparisons across different companies, and companies of various sizes in a common sector. By contrast, our absolute financed emissions metrics represent

the estimated total amount of GHG emitted into the atmosphere by our clients over a specific period, multiplied by an apportioning factor to account for our share of our clients’ emissions. As a result, our intensity-based emissions metrics may show a decline even though absolute emissions may be rising.

- Financed emissions targets include capital markets-facilitated activities: Debt and equity capital markets are key sources of financing for our clients, and we play a role in facilitating these transactions on their behalf. These activities are currently excluded from our footprint calculation as we work to estimate their impact in line with PCAF’s published guidance.⁷⁷ However, we have included capital markets activities in the scope of targets due to their strategic role in providing capital to our clients. In the future, we intend to adjust our methodology to align with PCAF’s published guidance and will continue to measure our progress toward these targets while we work to establish footprints for capital markets activities.

For additional methodology details on our Energy and Power Generation financed emissions targets, see [Advancing Our Climate Action Plan: Methodology for TD’s Interim Financed Emissions Targets](#), published in March 2022. For additional methodology details on our Automotive Manufacturing and Aviation financed emissions targets, see our [2022 Climate Action Report](#), published in March 2023.



Included in scope²

¹ Power companies that generate electricity are included in the scope of the interim financed emissions target for Power Generation. This also includes integrated power companies that are primarily transmission and distribution companies but also generate electricity.

² The grey chevrons in this graphic represent the sub-sectors that are included in TD’s financed emissions footprint and targets (sub-sectors in chevrons that are not coloured grey are not included within the boundary of the target for that sector).



Acronyms

Acronym	Definition
2SLGBTQ+	Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Plus
ABS	asset-backed securities
ACM	Automated Climate Model
AEI	Assess, Engineer, Install
AI	artificial intelligence
AML	anti-money laundering
APLMA	Asia Pacific Loan Market Association
ASL	American Sign Language
AVP	Associate Vice President
BDC	Business Development Bank of Canada
BECAP	Black Entrepreneur Credit Access Program
BPTN	Black Professionals Technology Network
CAD	Canadian dollar
CASC	Canadian Anti-Scam Coalition
CBA	Canadian Bankers Association
CCG	Community Capital Group
CCP	Core Carbon Principle
CDFIs	Community Development Financial Institutions
CDR	carbon dioxide removal
CEC	Climate Engagement Canada
CEO	Chief Executive Officer
CIP	Community Impact Plan
CMHC	Canada Mortgage and Housing Corporation
CO₂	carbon dioxide

CO₂e	carbon dioxide equivalent
COBIT	Control Objectives for Information and Related Technology
CRA	Community Reinvestment Act
CRE	Commercial Real Estate
CRO	Chief Risk Officer
CSA	Climate Scenario Analysis
D-SIBs	domestic systemically important banks
DAC	direct air capture
E&S	environmental and social
EACs	energy attribute certificates
ECG	Employee Consulting Group
ECP	Executive Compensation Plan
EPA	Environmental Protection Agency
ERF	Enterprise Risk Framework
ERM	Enterprise Risk Management
ERMC	Enterprise Risk Management Committee
ESFR	Energy Supply Financing Ratio
ESG	environmental, social and governance
ESG RM	ESG Risk Management
ESMC	Enterprise Sustainability Management Committee
ESROC	Enterprise Strategic Resiliency Oversight Committee
ESSC	Enterprise Sustainability SET Committee
ESTP	Enterprise Sustainability Transition Program
EVIC	Enterprise Value Including Cash
EVs	electric vehicles



Acronyms continued

EWf	Executive Women's Forum
EY	Ernst & Young LLP
FELI	Financed Emissions Lending Intensity
FRFIs	federally regulated financial institutions
FS-ISAC	Financial Services Information Sharing and Analysis Center
FSC	Forest Stewardship Council
G-SIB	global systemically important bank
gCO₂e/\$	grams of carbon dioxide equivalent per dollar lent
gCO₂e/pkm	grams of carbon dioxide equivalent per passenger kilometre
gCO₂e/vkm	grams of carbon dioxide equivalent per vehicle kilometre
GenAI	Generative AI
GHG	greenhouse gas
GOs	guarantees of origin
GSS	green, social and sustainability
GSSS	green, social, sustainability and sustainability-linked
HELOC	home equity lines of credit
HFCs	hydrofluorocarbons
HDI PCBs	high density interconnect printed circuit boards
HVAC	Heating, Ventilation and Air Conditioning
I-RECs	international renewable energy certificates
ICAO	International Civil Aviation Organization
ICMA	International Capital Markets Association
ICROA	International Carbon Reduction and Offset Alliance
ICVCM	Integrity Council on the Voluntary Carbon Market
IEA	International Energy Agency

IETA	International Emissions Trading Association
IFM	Improved Forest Management
IFRS	International Financial Reporting Standards
IIF	Institute of International Finance
IPCC	Intergovernmental Panel on Climate Change
ISF	Institute for Sustainable Finance
ISO	International Organization for Standardization
ISSB	International Sustainability Standards Board
ITIL	Information Technology Information Library
JEDI	Joint Economic Development Initiative
kgCO₂e	kilograms of carbon dioxide equivalent
kgCO₂e/MWh	kilograms of carbon dioxide equivalent per megawatt hour of electricity generated
KPIs	key performance indicators
KRIs	key risk indicators
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
LEI	Legendary Experience Index
LIHTC	Low-Income Housing Tax Credits
LLM	Large Language Model
LMA	Loan Market Association
LMI	low- and moderate-income
LSQ	Quebec Sign Language
LSTA	Loan Syndications and Trading Association
MD&A	Management's Discussion & Analysis
MLI	mortgage loan insurance



Acronyms continued

MRCs	major risk categories
MRM	Model Risk Management
MRV	monitoring, reporting and verification
MtCO₂e	megatonnes of carbon dioxide equivalent
NAICS	North American Industry Classification System
NGFS	Network for Greening the Financial System
NIST	National Institute of Standards and Technology
NIST CSF	NIST Cybersecurity 2.0 Framework
NMTC	New Markets Tax Credit
NRCan	Natural Resources Canada
OCC	Office of the Comptroller of the Currency
OROC	Operational Risk Oversight Committee
OSFI	Office of the Superintendent of Financial Institutions
OSFI SCSE	OSFI Standardized Climate Scenario Exercise
OTC	over the counter
PCAF	Partnership for Carbon Accounting Financials
PEI	physical emissions intensity
PML	probable maximum loss
PRI	Principles for Responsible Investment
RAG	Retrieval Augmented Generation
RAS	Risk Appetite Statement
RCP	Representative Concentration Pathways
RECs	renewable energy certificates
REITs	Real Estate Investment Trusts

RESL	Real Estate Secured Lending
SASB	Sustainability Accounting Standards Board
SBTi	Science Based Targets Initiative
SCCO	Senior Customer Complaints Office
SDFT	Sustainable & Decarbonization Finance Target
SET	senior executive team
SLBs	sustainability-linked bonds
SLLs	sustainability-linked loans
SPTs	sustainability performance targets
SRC	Smart Retail Controls
SUVs	sport utility vehicles
TCFD	Task Force on Climate-related Financial Disclosures
tCO₂e	tonnes of carbon dioxide equivalent
TD GSD	TD Global Security and Defence
TD NREG	TD National Real Estate Group
TD SAFE	TD Security Awareness for Everyone
TDAM	TD Asset Management Inc.
TDBNA	TD Bank, National Association
TDI	TD Insurance
TRA	Transition Readiness Assessment
UDAAP	unfair, deceptive or abusive acts or practices
UN SDGs	United Nations Sustainable Development Goals
UNEP FI	United Nations Environment Programme Finance Initiative
UNEP FI PSI	UNEP FI Principles for Sustainable Insurance



Acronyms continued

UNGPs	United Nations Guiding Principles on Business and Human Rights
VCS	Verified Carbon Standard
VP	Vice President
VST	Victim Services Toronto
WDS	Wildfire Defense Systems
YoY	year-over-year



End Notes

- 1 Performance indicators for which EY has provided a limited level of assurance, as outlined in the 2025 Assurance Report for Sustainability Metrics. Unless otherwise indicated, amounts related to prior years have been assured previously and are available through the Archived Sustainability Report page on our [website](#).
- 2 Each year, the SCCO publishes an [Annual Report](#), which is used as an opportunity to support our clients by including helpful tips by sharing case studies and observations.
- 3 Government of Canada. 2024. Sustainable Finance. [online] Available at: <https://www.canada.ca/en/department-finance/programs/financial-sector-policy/sustainable-finance.html>
- 4 See the [TD Sustainable & Decarbonization Finance Target Methodology](#) for further details on how these business activities are defined and how progress toward the target was calculated.
- 5 Only eligible activities pursuant to the Sustainable & Decarbonization Finance Target Methodology are included in the target.
- 6 Green, social and sustainability bonds, loans, and other debt products are those with 100% of net proceeds allocated to predetermined eligible green and/or social activities. Sustainability-linked bonds (SLBs) and sustainability-linked loans (SLLs) are designed to incentivize companies to achieve certain specified sustainability performance targets (SPTs) associated with defined key performance indicators (KPIs). The emissions impact of an SLB or SLL will vary depending on a number of variables, including the chosen KPIs, the scope of the KPIs, the associated SPTs, and other activities of the borrower. Relevant guidelines, principles and methodologies, such as the International Capital Markets Association (ICMA) Green and Social Bond Principles, ICMA Sustainability Bond Guidelines, ICMA Sustainability-Linked Bond Principles, Asia Pacific Loan Market Association (APLMA), Loan Market Association (LMA) and Loan Syndications and Trading Association (LSTA) Green and Social Loan Principles, and/or LSTA Sustainability Linked Loan Principles are used to support the structuring of GSSS bonds, loans, and other debt instruments.
- 7 Carbon trading capabilities held within TD Securities' Global Commodities.
- 8 The MSCI ESG Quality Rating measures the ability of underlying holdings to manage key medium- to long-term risks and opportunities arising from environmental, social and governance factors. The MSCI ESG Quality Rating is calculated using the fund weighted average ESG score adjusted for ESG rating trends and laggards. Certain information contained herein (the "Information") is sourced from/copyright of MSCI Inc., MSCI ESG Research LLC, or their affiliates ("MSCI"), or information providers (together, the "MSCI Parties") and may have been used to calculate scores, signals, or other indicators. The Information is for internal use only and may not be reproduced or disseminated in whole or part without prior written permission. The Information may not be used for, nor does it constitute, an offer to buy or sell, or a promotion or recommendation of, any security, financial instrument or product, trading strategy or index, nor should it be taken as an indication or guarantee of any future performance. Some funds may be based on or linked to MSCI indexes, and MSCI may be compensated based on the fund's assets under management or other measures. MSCI has established an information barrier between index research and certain Information. None of the Information in and of itself can be used to determine which securities to buy or sell or when to buy or sell them. The Information is provided "as is" and the user assumes the entire risk of any use it may make or permit to be made of the Information. No MSCI Party warrants or guarantees the originality, accuracy and/or completeness of the Information and each expressly disclaims all express or implied warranties. No MSCI Party shall have any liability for any errors or omissions in connection with any information herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.
- 9 Catastrophe claims are insurance claims that relate to any single event that occurred in the relevant fiscal quarter for which the aggregate insurance claims are equal to or greater than an internal threshold of \$5 million before reinsurance. The Bank's internal threshold may change from time to time. The total amount of catastrophe claims presented reflects the estimated pre-tax cost of these claims net of recoveries from related reinsurance coverage and, when applicable, includes the cost of reinsurance reinstatement premiums. The total amount of catastrophe claims is included in Insurance service expenses, and amounts related to reinsurance coverage are included in Other income (loss) on the Bank's Consolidated Statement of Income.
- 10 Issued under the 2020 Sustainable Bonds Framework.
- 11 Funding specifically designated for projects in relation to the COVID-19 outbreak.
- 12 This target includes bonds based on Bloomberg's designation as green, social, and/or sustainability bonds.
- 13 The as-at approach captures the current position by incorporating new purchases, maturities, sales, FX movements and reclassifications. This approach provides a snapshot of bond holdings at any given point in time. The as-at approach is used to track TD's ESG commitment to hold \$15 to \$20 billion in green, social, sustainability and pandemic bonds in its treasury investment portfolio at each fiscal period-end.
- 14 Future balances may fluctuate due to many factors, including market investment opportunities, changes in portfolio size, and foreign exchange rates. There is overlap between these fiscal 2025 bond holdings and the treasury investments included in the fiscal 2025 progress toward TD's \$500 billion Sustainable & Decarbonization Finance Target. In subsequent years, eligible bond purchases will be counted toward the Target in the fiscal year in which they are purchased.
- 15 Includes both supporting clients in conventional energy who seek to reduce their emissions (e.g., via technology solutions to mitigate, eliminate, or reduce GHG emissions), while also supporting lower-emission energy sources and other climate solutions (e.g., electrification, carbon capture and removal) where TD sees growth opportunities.
- 16 2025. DataIQ. Best Responsible AI Program or Initiative – TD: Trustworthy AI. DataIQ Awards North America 2025. [online] Available at: <https://www.dataiq.global/award-winner/best-responsible-ai-program-or-initiative-td-trustworthy-ai/>
- 17 July 23, 2025. LLM-as-a-judge: a complete guide to using LLMs for evaluations. Evidently AI. [online] Available at: <https://www.evidentlyai.com/llm-guide/llm-as-a-judge>
- 18 2025. What is Retrieval-Augmented Generation? AWS. [online] Available at: <https://aws.amazon.com/what-is/retrieval-augmented-generation/>
- 19 International Monetary Fund. Income Inequality. [online] Available at: <https://www.imf.org/en/topics/inequality>; United Nations Department of Economic and Social Affairs. 2025. World Social Report 2025: A New Policy Consensus to Accelerate Social Progress. [online] Available at: <https://social.desa.un.org/issues/world-social-report>.
- 20 Participants include clients and community members who take part in or receive information through sessions or programs in Canada and/or the U.S. that aim to improve their financial knowledge. "TD-led" initiatives include activities facilitated or delivered directly by TD. "TD-supported" initiatives include programs facilitated by or with charitable organizations that are both partially and fully funded by TD. Due to data and practical limitations, participants may be counted toward this target where they attend only part of a session or program. In addition, the number of participants reported may not reflect unique participants, as participants might engage with multiple programs. In 2024, we updated our methodology to ensure all applicable financial education activities are being captured, leading to additional in-scope TD-led financial education platforms being captured this year towards the financial education target. Prior to 2021, TD had a target for TD-supported financial education, which has now been broadened and recalibrated to reflect our current approach and ambition.
- 21 January 9, 2024. What is market-rate housing? National League of Cities. [online] Available at: <https://www.nlc.org/article/2024/01/09/what-is-market-rate-housing/>
- 22 September 2023. Building sustainably: Mass timber. Environmental and Energy Study Institute [online] Available at: https://www.eesi.org/files/FactSheet_Mass_Timber_2023.pdf; Natural Resources Canada. Mass timber buildings are sustainable, safe and healthy [online] Available at: https://natural-resources.canada.ca/sites/nrcan/files/forest/sof2021/Mass-timber_EN_web_accessible.pdf
- 23 January 9, 2024. What is market-rate housing? National League of Cities. [online] Available at: <https://www.nlc.org/article/2024/01/09/what-is-market-rate-housing/>
- 24 PCB Unlimited. High density interconnect (HDI) printed circuit boards (PCBs): getting to know HDI PCBs. [online] Available at: <https://www.pcbunlimited.com/engineering/high-density-interconnect-pcb>
- 25 As logged by TD colleagues on the TD Ready Commitment Network.



End Notes continued

- 26 The Bank's carbon-related assets and carbon-intensive sectors metrics are distinct but complementary measures of exposure to climate-sensitive sectors. Carbon-related assets follow TCFD guidance.
- 27 Indirect auto lending refers to TD Auto Finance offering automobile financing to customers through a wide network of dealerships.
- 28 See TD's [2025-Q4 Supplemental Regulatory Disclosure](#), page 25, Line #9, where the total (retail and non-retail) gross credit risk exposures (excluding counterparty credit risk exposures to repo-style transactions and over-the-counter (OTC) derivatives), amounts to \$1,764,817, and represents Total Assets for the purpose of the Carbon-Related Assets Relative to Total Assets climate-related risk metric.
- 29 Implementing the Recommendations of the Task Force on Climate-related Financial Disclosures. Available at: <https://assets.bbhub.io/company/sites/60/2021/07/2021-TCFD-Implementing-Guidance.pdf>. As of 2024, the IFRS Foundation took over responsibility for overseeing corporate climate-related disclosures from the TCFD. The International Sustainability Standards Board (ISSB) finalized the IFRS Sustainability Disclosure Standards in June 2023, which fully integrate TCFD's recommendations. The TCFD recommendations continue to serve as a resource for companies. See more on the IFRS, ISSB and TCFD at <https://www.ifrs.org/sustainability/tcfd/>.
- 30 Scope 1 GHG emissions include direct GHG emissions that occur from sources that are owned or controlled by TD, such as emissions from combustion in boilers, furnaces, vehicles, etc. Scope 2 GHG emissions include indirect GHG emissions from purchased electricity, heat, cooling or steam that is generated off-site and consumed by TD across our real estate portfolio. Scope 3 non-financed GHG emissions include other relevant, significant Scope 3 indirect GHG emissions that occur in our value chain, except from Category 15: Investments (TD currently only calculates financed emissions from Scope 3 Category 15). For TD, this includes GHG emissions from Purchased Goods and Services, Capital Goods, Fuel- and Energy-Related Activities, Business Travel, Upstream Leased Assets and Downstream Leased Assets.
- 31 Absolute emissions represent the volume of GHG emissions expressed in tonnes of carbon dioxide equivalent (CO₂e). Absolute emissions refer to generated emissions and not values relating to avoided emissions or emission removals. Gross emissions represent the total GHG emissions before any deductions are made to take account of offset credits or renewable energy certificates.
- 32 In accordance with the GHG Protocol's Scope 2 Guidance, TD reports both location-based and market-based Scope 2 GHG emissions figures. This table reflects location-based GHG emissions, which account for emissions from the electricity physically delivered to a company (i.e., it reflects the average emissions intensity of grids on which energy consumption occurs). The market-based approach represents Scope 2 emissions based on how an organization buys its energy (i.e., it derives emission factors from contractual instruments, such as green power contracts or renewable energy certificates).
- 33 Scope 3 non-financed GHG emissions include other relevant Scope 3 indirect GHG emissions that occur in our value chain, except from Category 15: Investments (TD currently only calculates financed emissions from Scope 3 Category 15). For TD, this includes GHG emissions from Purchased Goods and Services, Capital Goods, Fuel- and Energy-Related Activities, Business Travel, Upstream Leased Assets and Downstream Leased Assets.
- 34 See "Our Approach to Calculating Operational GHG Emissions" in the [2025 Sustainability Performance Data Pack & Indices](#) for details on our organizational boundary, reporting period, and other key details related to our Scope 3 non-financed GHG emissions.
- 35 Category 4 – Upstream Transportation and Distribution and Category 9 – Downstream Transportation and Distribution are calculated as part of Category 1 – Purchased Goods and Services, in line with guidance contained in the Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Category 5 – Waste Generated in Operations, Category 7 – Employee Commuting, and Category 12 – End of Life Treatment of Sold Products are relevant for TD; however, these categories were determined to be insignificant. Category 10 – Processing of Sold Products, Category 11 – Use of Sold Products, and Category 14 – Franchises were determined to be irrelevant for TD.
- 36 Given the significant volatility in 2020 and 2021 from global events (e.g., COVID-19 lockdowns and subsequent re-openings), we have used 2019 as our operational GHG baseline for all targets established to date so that the baseline reflects "normal" operations.
- 37 As TD is not a member, this target has not been validated by the SBTi.
- 38 The reporting period for TD's real estate data spans August 1 to July 31, while the reporting period for other data sources is aligned with the fiscal year.
- 39 IPCC, 2023: Sections. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Core Writing Team, H. Lee and J. Romero (eds.)]. IPCC, Geneva, Switzerland, pp. 35-115, doi: 10.59327/IPCC/AR6-9789291691647 [https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf]
- 40 Carbon dioxide equivalent (CO₂e) is a measure used to compare the emissions of different greenhouse gases on the basis of their global-warming potential. CO₂e signifies the number of metric tonnes of CO₂ emissions with the same global warming potential as one metric tonne of another greenhouse gas (e.g., nitrous oxide and methane). Carbon dioxide removal is the process of removing carbon dioxide from the atmosphere using natural or technological processes. The International Energy Forum defines unabated GHG emissions as greenhouse gases that are released into the atmosphere from fossil fuels without any offsetting or removal, contributing to global warming in the process. <https://www.ief.org/news/abated-vs-unabated-emissions-why-they-matter-for-achieving-net-zero>
- 41 See Table 12.6 on page 31 in Babiker, M., G. Berndes, K. Blok, B. Cohen, A. Cowie, O. Geden, V. Ginzburg, A. Leip, P. Smith, M. Sugiyama, F. Yamba, 2022: Cross-sectoral perspectives. In IPCC, 2022: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.005 [<https://www.ipcc.ch/report/ar6/wg3/chapter/chapter-12/>]
- 42 Intergovernmental Panel on Climate Change. 2022. Carbon Dioxide Removal. [online] Available at: https://www.ipcc.ch/report/ar6/wg3/downloads/outreach/IPCC_AR6_WGIII_Factsheet_CDR.pdf
- 43 Business travel includes emissions from commercial air travel, chartered jets, rail travel, car rentals and personal vehicles used for business travel.
- 44 All carbon credits purchased voluntarily by TD must be verified using a voluntary carbon market standard that is endorsed by the International Carbon Reduction and Offset Alliance (ICROA) and that is in full compliance with the applicable endorsement and assessment criteria. Examples of ICROA-endorsed standards considered by TD include the Verified Carbon Standard, Gold Standard, and American Carbon Registry.
- 45 The carbon credits we have purchased/used were not sold within the state of California.
- 46 Retirement of carbon credits refers to the use of carbon credits.
- 47 Business travel includes emissions from commercial air travel, chartered jets, rail travel, car rentals and personal vehicles used for business travel. In addition, TD used 9,225 (for 2023) and 9,070 (for 2024), independently verified U.S. carbon reduction credits, to account for the increase in US emissions for business travel due to the integration of Cowen data.
- 48 Carbon instruments considered by TD in 2025 included carbon credits and Energy Attribute Certificates (EACs). EACs is the umbrella term encompassing the environmental benefits of all renewable electricity instruments such as renewable energy certificates (RECs), International RECs (I-RECs), guarantees of origin (GOs), and similar instruments. Per TD Enterprise Guidance, although TD is not a member of RE100, all EACs purchased have to align with the RE100 methodology. Also per TD Enterprise Guidance, all carbon credits purchased voluntarily by TD must be verified using a voluntary carbon market standard that is endorsed by the International Carbon Reduction and Offset Alliance (ICROA) and that is in full compliance with the applicable endorsement and assessment criteria. Examples of ICROA-endorsed standards considered by TD include the Verified Carbon Standard, Gold Standard and American Carbon Registry.
- 49 Babiker, M., G. Berndes, K. Blok, B. Cohen, A. Cowie, O. Geden, V. Ginzburg, A. Leip, P. Smith, M. Sugiyama, F. Yamba, 2022: Cross-sectoral perspectives. In IPCC, 2022: Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdajie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.005 [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Chapter12.pdf]
- 50 For more information on the direct air capture transaction, visit: <https://td.mediaroom.com/2023-11-01-IPointFive-and-TD-Announce-One-of-the-Finance-Industrys-Largest-Purchases-of-Direct-Air-Capture-Carbon-Removal-Credits>



End Notes continued

- 51 These carbon removal credits are not used to meet our Scope 1 and 2 reduction target.
- 52 The remaining portion of attributed financed emissions that are not covered by the four interim targets stem from other sectors for which we have not yet set targets due to challenges with data or methodologies. We continue to explore ways to enhance our access to and the quality of data in additional sectors, and we support the advancement of methodologies through organizations such as Partnership for Carbon Accounting Financials (PCAF).
- 53 The Bank's carbon-related assets and carbon-intensive sectors metrics are distinct but complementary measures of exposure to climate-sensitive sectors. Carbon-related assets follow TCFD guidance and support the prioritization of climate transition risk management activities. Carbon-intensive sectors follow industry guidance across four PCAF asset classes and support sustainability strategy development.
- 54 We leveraged external sources, including S&P Global Trucost for emissions and client financial data, Environmental Protection Agency (EPA) emissions data for consumer auto loans, and Natural Resources Canada (NRCAN) emissions data for residential mortgages. Where data was unavailable or presented significant challenges, we used the PCAF guidance and PCAF database for alternative estimation methodologies, as well as internally calculated emissions factors. Our internally developed emissions factors for non-retail sectors are revenue- and asset-based averages calculated at the sub-sector level by incorporating all of the North American-based companies in the corresponding sub-sector that have emissions data in S&P Global Trucost. While these factors are volatile to changes in company financials, they provide a more representative estimate of emissions given our North American footprint. Since financed emissions are attributed to a financial institution based on the ratio of the financing commitments to the client and the client's enterprise value, valuation changes can lead to a higher or lower attribution ratio and create volatility in the results year over year.
- 55 More details on PCAF's data quality scoring approach by asset class are available in the Part A: Financed Emissions standards, and can be found on pages 46, 60, 86 and 94 at <https://carbonaccountingfinancials.com/files/standard-launch-2025/PCAF-PartA-2025-V3-December.pdf>
- 56 Carbon-intensive sectors follow industry guidance across four PCAF asset classes and support sustainability strategy development.
- 57 Three emission baselines have been restated to incorporate the available client emissions data, driven by two main factors: (1) external data vendors reassessed estimated emissions for some clients; and (2) some clients have disclosed emissions for the first time, covering years dating back to 2019.
- 58 International Energy Agency. October 2024. World Energy Outlook 2024. [online] Available at: <https://www.iea.org/reports/world-energy-outlook-2024>
- 59 International Energy Agency. October 2023. World Energy Outlook 2023. [online] Available at: <https://www.iea.org/reports/world-energy-outlook-2023>
- 60 International Energy Agency. October 2024. World Energy Outlook 2024. [online] Available at: <https://www.iea.org/reports/world-energy-outlook-2024>
- 61 International Energy Agency (IEA). 2024. Global EV Outlook 2024 – Trends in Electric Cars. [online] Available at: <https://www.iea.org/reports/global-ev-outlook-2024/trends-in-electric-cars>
- 62 International Energy Agency (IEA). May 2024. SUVs are setting new sales records each year – and so are their emissions. [online] Available at: <https://www.iea.org/commentaries/suvs-are-setting-new-sales-records-each-year-and-so-are-their-emissions>
- 63 International Civil Aviation Organization. The World of Air Transport in 2023. [online] Available at: <https://www.icao.int/world-air-transport-2023>
- 64 International Civil Aviation Organization. The World of Air Transport in 2019. [online] Available at: <https://www2023.icao.int/annual-report-2019/Pages/the-world-of-air-transport-in-2019.aspx>
- 65 Load factor is a key determinant in the calculation of TD's chosen target metric for Aviation, which is GHG emissions per passenger kilometre flown. With higher load factors (i.e., a higher percentage of seats that are filled by passengers) the emissions intensity is lower, as the number of passenger kilometres for each journey is higher.
- 66 International Air Transport Association. December 2019. Air Passenger Market Analysis. [online] Available at: <https://www.iata.org/en/iata-repository/publications/economic-reports/air-passenger-monthly---dec-2019/#:~:text=Capacity%20expanded%20by%203.4%25%20in,new%20record%20high%20of%2082.6%25>
- 67 OECD. November 7, 2024. The Climate Action Monitor 2024. [online] Available at: https://www.oecd.org/en/publications/the-climate-action-monitor-2024_787786f6-en.html
- 68 Clients in scope of Transition Readiness Assessments are corporate and commercial lending and capital markets clients in scope of our 2030 interim financed emissions targets.
- 69 The automation of data collection increased the number of clients scored by 42% in 2023, and 34% in 2024. It also allowed us to score Transportation sector clients in 2023, a year when manual data was not collected.
- 70 Due to automation enhancements this year, we have restated previously disclosed transition readiness assessments.
- 71 Due to automation enhancements this year, we have restated previously disclosed transition readiness assessments.
- 72 Due to automation enhancements this year, we have restated previously disclosed transition readiness assessments.
- 73 Figures do not include fund investments entered into by TD Cowen prior to March 1, 2023.
- 74 The TD Greystone Infrastructure Strategy does not commit to making any sustainable investments as defined by Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November, 2019 on sustainability-related disclosures in the financial services sector.
- 75 As per the International Energy Agency's definition of clean energy. Source: <https://www.iea.org/glossary>
- 76 The SDGs are a set of 17 integrated and indivisible goals set out by the United Nations, acting as a call for action by all countries to promote prosperity while protecting the planet. The SDGs address a range of global challenges, including those related to poverty, inequality, climate change, environmental degradation, peace and justice. More information is available at <https://sdgs.un.org/>
- 77 Partnership for Carbon Accounting Financials. December 2023. The Global GHG Accounting & Reporting Standard Part B: Facilitated Emissions. [online] Available at: <https://carbonaccountingfinancials.com/files/PCAF-PartB-Facilitated-Emissions-Standard-Dec2023.pdf>



Caution Regarding Forward-Looking Statements

From time to time, The Toronto-Dominion Bank and its subsidiaries, collectively known as TD Bank Group (“TD” or the “Bank”), makes written and/or oral forward-looking statements, including in this document, in other filings with Canadian regulators or the United States (U.S.) Securities and Exchange Commission (SEC), and in other communications. In addition, representatives of the Bank may make forward-looking statements orally to analysts, investors, the media and others. All such statements are made pursuant to the “safe harbour” provisions of, and are intended to be forward-looking statements under, applicable Canadian and U.S. securities legislation, including the U.S. Private Securities Litigation Reform Act of 1995. Forward-looking statements include, but are not limited to, statements made in this document regarding the Bank’s economic and sustainability (environmental, decarbonization and social)-related objectives, vision, commitments, goals, metrics and targets, including the Bank’s net-zero and greenhouse gas (GHG) emissions reduction targets, its Sustainable & Decarbonization Finance Target, its goals and targets pursuant to the Bank’s social framework “TD Pathways to Economic Inclusion,” and its other sustainability-related goals. Any forward-looking statements contained in this document represent the views of management only as of the date hereof and are presented for the purpose of assisting the Bank’s stakeholders in understanding the Bank’s vision, objectives, metrics and targets as well as its economic and sustainability-related objectives and impacts and such forward-looking statements may not be appropriate for other purposes.

Forward-looking statements are typically identified by words such as “suggest”, “seek”, “ambition”, “strive”, “confident”, “anticipate”, “believe”, “could”, “estimate”, “expect”, “forecast”, “goal”, “intend”, “may”, “outlook”, “plan”, “possible”, “potential”, “predict”, “project”, “foresee”, “commit”, “should”, “target”, “objective”, “timeline”, “will”, and “would” and similar expressions or variations thereof, or the negative thereof, but these terms are not the exclusive means of identifying such statements. By their very nature, these forward-looking statements require the Bank to make assumptions and are subject to inherent risks and uncertainties, general and specific. Especially in light of the uncertainty related to the physical, financial, economic, political, and regulatory environments, such risks and uncertainties – many of which are beyond the Bank’s control and the effects of which can be difficult to predict – may cause actual results to differ materially from the expectations, predictions, forecasts, projections, estimates, targets, or intentions expressed in the forward-looking statements.

In particular, because of the limitations and uncertainties inherent in climate science, risk analysis and reporting, the Bank has relied upon various market practices, taxonomies, methodologies, criteria and standards, and made reasonable approximations and assumptions, in establishing its sustainability-related goals. However, there are many factors that the Bank may not foresee or be able to accurately predict which may impact the Bank’s ability to achieve its sustainability-related goals or otherwise achieve the results anticipated by such forward-looking statements. Those factors include the absence of a standardized taxonomy regarding sustainability-related terms (including in meaning and scope), the absence of standardized

methodologies for classifying sustainability-related activities or for evaluating their impact, the availability of comprehensive and high-quality data (including from the Bank’s clients on whom the Bank may be required to rely for information), the assumptions underlying third-party decarbonization scenarios, economic trends (including changes in interest rates), fluctuations in the Bank’s clients’ enterprise values, the applicable domestic and international regulatory regimes, the need for active and continuing participation of stakeholders (including enterprises, financial institutions and governmental and non-governmental organizations), the development and deployment of new technologies and production methods, border measures, and the availability of sector-specific solutions, among other unforeseen events or conditions.

The Bank cautions that the preceding list is not exhaustive of all possible risk factors and other factors may cause actual results to differ materially from the Bank’s expectations and may result in the Bank modifying its forward-looking statements, including its sustainability-related goals. Additional information regarding the assumptions, risks and uncertainties underlying the Bank’s forward-looking statements can be found in the “Risk Factors and Management” section of the Bank’s 2025 Management’s Discussion and Analysis (“MD&A”), as may be updated in subsequently filed quarterly reports to shareholders and news releases (as applicable) related to any events or transactions discussed under the headings “Significant Events” or “Significant and Subsequent Events” in the relevant MD&A, which may be found on www.td.com.

All such factors, as well as other uncertainties and potential events, and the inherent uncertainty of forward-looking statements, should be considered carefully when making decisions with respect to the Bank. The Bank cautions readers not to place undue reliance on the Bank’s forward-looking statements.

The Bank does not undertake to update any forward-looking statement, whether written or oral, that may be made from time to time by or on its behalf, except as required by law.

Additional Caution Regarding Sustainability-Related Disclosures

In addition, the Bank cautions readers of the following regarding the sustainability-related disclosures included in this document:

- The terms “sustainability”, “sustainable investing”, “sustainable finance”, “ESG”, “carbon neutral”, “decarbonization”, “net-zero” and similar terms, taxonomies, methodologies, criteria and standards are evolving in terms of both meaning and scope. As a result, the Bank’s use of such terms may vary over time to reflect such changes. Any references to such terms in this document are intended as references to the internally defined criteria of the Bank and not to any jurisdiction-specific regulatory definition or voluntary standard that may exist.
- The Bank has assumed continued growth in its clients’ investments in and expenditures on sustainability activities (including

environmental, decarbonization and social activities) in light of regulatory, policy, economic, technological, climatic and other trends. The Bank has also assumed ordinary rates of growth and development of the Bank’s business, including in its lending, financing, underwriting and advisory services, in its own investments, in all sectors, in its ownership and control of subsidiaries and in its geographic footprint (including through relocations, mergers, acquisitions, or dispositions). If any of these assumptions prove incorrect, it could have a material effect on the Bank’s sustainability-related goals and the Bank’s ability to meet them.

- There could be changes to the market practices, taxonomies, methodologies, criteria and standards that regulators, non-governmental bodies, the financial sector, civil society, the Bank and its clients use to classify, measure, determine the eligibility of, report on and verify financial transactions and environmental, decarbonization and social activities for inclusion toward the Bank’s sustainability-related goals, or to evaluate the impact of such activities. In some cases, these market practices, taxonomies, methodologies, criteria and standards may not yet exist. The Bank may update its sustainability-related goals, its progress toward those goals, and the eligibility of certain transactions and activities, as appropriate, in light of new and evolving market practices, taxonomies, methodologies, criteria and standards.
- In making and implementing its sustainability-related goals, the Bank must rely on data obtained from clients and other third-party sources. The Bank’s use of third-party data must not be taken as an endorsement of such third party or its data or be construed as granting any form of intellectual property. Although the Bank believes these sources are reliable, the Bank has not independently verified any third-party data, or assessed the assumptions underlying such data, and cannot guarantee the accuracy, reliability and completeness of such third-party data or assumptions. The data used by the Bank in connection with its sustainability-related goals, including to evaluate clients’ intended use of capital, may be limited in quality, unavailable, or inconsistent across sectors. Certain third-party data may also change over time as market practices, taxonomies, methodologies, criteria and standards evolve. These factors and related uncertainties could have a material effect on the Bank’s sustainability-related goals and the Bank’s ability to meet them.
- The Bank and its clients may need to or elect to purchase carbon and clean energy instruments, including carbon offset and removal credits and renewable energy credits, to meet sustainability-related goals. The market for these instruments is still developing and their availability may be limited. Some of these instruments are also subject to the risk of invalidation or reversal, and the Bank provides no assurance of the treatment of any such instruments in the future. There may also be changes to applicable regulations and standards that impact the market for carbon and clean energy instruments. The maturity, liquidity and economics of this market may make it more difficult for the Bank to achieve its sustainability-related goals.

- Failure to successfully manage E&S-related expectations across various divergent perspectives may negatively impact the Bank’s reputation and financial results. “Greenwashing” and “social washing” can occur where claims of E&S benefits are made in relation to products or services or corporate performance that are false, give a misleading impression, or are not supported or substantiated.
- Except as otherwise noted, the information contained in this document is unaudited. Ernst & Young LLP (“EY”) has performed a limited assurance engagement for a select number of the Bank’s sustainability performance indicators, as set out in EY’s 2025 Assurance Report for Sustainability Metrics, and a reasonable assurance engagement for the Bank’s use of net proceeds from its 2023 Green Bond issuance, as set out in EY’s 2025 Assurance Report as Referenced in TD Sustainable Financing Report. The remainder of the information contained in this document was not subject to any assurance engagement. You can read more about the scope of EY’s work in the Assurance Reports hyperlinked above.

Additional Disclaimers

This document is intended to provide information from a different perspective and in more detail than is required to be included in mandatory securities filings. This document is not required to be prepared or filed by the Bank under Canadian or U.S. securities laws. The information contained herein should not be read as necessarily rising to the level of materiality of disclosure required in our securities law filings and such information should not be considered to be incorporated by reference into any such filings. This document should not be used as a basis for trading in securities of the Bank or for any other investment decision. This document is not intended to constitute financial, legal, tax, investment, professional or expert advice. No representation or warranty, express or implied, is or will be made in relation to the accuracy, reliability or completeness of the information contained in this document. This document may provide addresses of, or contain hyperlinks to, websites that are not owned or controlled by the Bank. Each such address or hyperlink is provided solely for the recipient’s convenience, and the content of linked third-party websites is not in any way included or incorporated by reference into this document. The Bank takes no responsibility for such websites or their content, or for any loss or damage that may arise from their use. If you decide to access any of the third-party websites linked to this document, you do so at your own risk and subject to the terms and conditions of such websites.